

**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> , <sup>1</sup> | § | Case No. 24-90448 (ARP) |
|                                                  | § |                         |
| Debtors.                                         | § | (Jointly Administered)  |
|                                                  | § |                         |

**THE AD HOC GROUP OF SAFE PARTIES' DESIGNATION OF ITEMS  
TO BE INCLUDED IN THE RECORD AND STATEMENT OF ISSUES ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Ad Hoc Group of SAFE Parties<sup>2</sup> (the “**SAFE AHG**”), as creditors in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), respectfully submits the following statement of the issues to be presented and designation of the items to be included in the record on appeal, in reference to the Notice of Appeal filed by the SAFE AHG on January 7, 2026 [Dkt No. 2214], of the *Final Order Allowing Compensation and Reimbursement of Expenses* to Lehotsky Keller Cohn LLP [Dkt. No. 2198] (the “**Final Order**”), entered by the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Court**”) on December 24, 2025, as well as all prior orders and rulings merged thereto.

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<sup>1</sup> 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), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), Rhodium Encore Sub LLC (1064), Rhodium Enterprises, Inc. (6290), Rhodium Industries LLC (4771), Rhodium Ready Ventures LLC (8618), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Renewables Sub LLC (9511), Rhodium Shared Services LLC (5868), and Rhodium Technologies LLC (3973). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

<sup>2</sup> The members of the Ad Hoc Group of SAFE Parties are set forth in the *Third Supplemental Verified Statement of Ad Hoc Group of SAFE Parties Pursuant to Bankruptcy Rule 2019* [Docket No. 1346].



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**DESIGNATIONS TO BE INCLUDED IN THE RECORD ON APPEAL**

The SAFE AHG hereby designates the following items to be included in the record on appeal of the Final Order. The following designations include all exhibits, addenda, and documents attached thereto, filed therewith, or incorporated by reference therein.

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                          |
|--------------------|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9/22/24            | 173                  | Application to Employ Lehotsky Keller Cohn LLP as Special Litigation Counsel (Attachments: # 1 Proposed Order)                                                                                        |
| 09/26/24           | 194                  | Certificate of Service re: Documents Served on September 23, 2024                                                                                                                                     |
| 10/14/24           | 263                  | Order Granting the Application for Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel                                                           |
| 10/17/24           | 279                  | BNC Certificate of Mailing                                                                                                                                                                            |
| 10/25/24           | 342                  | Certificate of Service re: Documents Served on or before October 15, 2024                                                                                                                             |
| 11/06/24           | 382                  | Notice Lehotsky Keller Cohn LLP's First Monthly Fee Statement for the Period August 28, 2024, through September 30, 2024                                                                              |
| 11/11/24           | 419                  | Declaration re: Amended Declaration of Jonathan F. Cohn in Support of the Application for an Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel |
| 11/12/24           | 425                  | Notice Lehotsky Keller Cohn LLP's Second Monthly Fee Statement for the Period October 1, 2024, through October 31, 2024                                                                               |
| 11/19/24           | 459                  | Certificate of Service re: Documents Served on November 6, 2024                                                                                                                                       |
| 11/26/24           | 510                  | Certificate of Service re Documents Served on or before November 12, 2024                                                                                                                             |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                                                                                                                                                      |
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| 12/04/24           | 538                  | Notice Lehotsky Keller Cohn LLP's Third Monthly Fee Statement for the Period November 1, 2024, through November 30, 2024                                                                                                                                                                                                                                          |
| 12/09/24           | 570                  | Certificate of Service re: 1) Lehotsky Keller Cohn LLPs Third Monthly Fee Statement for the Period November 1, 2024, Through November 30, 2024; and 2) Second Monthly Fee Statement of Province, LLC for Compensation for Services and Reimbursement of Expenses as Financial Advisor to the Debtors for the Period from October 1, 2024 Through October 31, 2024 |
| 12/16/24           | 579                  | Interim Order on Phase 1 of Motion to Assume Executory Contracts                                                                                                                                                                                                                                                                                                  |
| 01/28/25           | 730                  | Notice Lehotsky Keller Cohn LLP's Fourth Monthly Fee Statement for the Period December 1, 2024, through December 31, 2024                                                                                                                                                                                                                                         |
| 02/04/25           | 752                  | Certificate of Service re Lehotsky Keller Cohn LLP's Fourth Monthly Fee Statement for the Period December 1, 2024 Through December 31, 2024                                                                                                                                                                                                                       |
| 02/10/25           | 765                  | Interim Application for Compensation for Lehotsky Keller Cohn LLP, Special Counsel, Period: 8/28/2024 to 11/30/2024, Fee: \$1,939,497.75, Expenses: \$47,229.25. (Attachments: # 1 Proposed Order)                                                                                                                                                                |
| 02/12/25           | 772                  | Certificate of Service re Documents Served on February 10, 2025                                                                                                                                                                                                                                                                                                   |
| 02/21/25           | 790                  | Notice Lehotsky Keller Cohn LLP Fifth Monthly Fee Statement for the Period January 1, 2025, through January 31, 2025                                                                                                                                                                                                                                              |
| 02/26/25           | 819                  | Certificate of Service re 1) Lehotsky Keller Cohn LLP's Fifth Monthly Fee Statement for the Period January 1, 2025, Through January 31, 2025; and 2) Agreed [Proposed] Order Granting Debtors' Motion and Supplemental Motion to Assume Certain Executory Contracts with Whinstone US, Inc                                                                        |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                              |
|--------------------|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 03/06/25           | 835                  | Amended Application to Employ Lehotsky Keller Cohn LLP as Special Litigation Counsel (Attachments: # 1 Proposed Order)                                                                                                                    |
| 03/07/25           | 836                  | Order Allowing Interim Compensation and Reimbursement of Expenses                                                                                                                                                                         |
| 03/09/25           | 838                  | BNC Certificate of Mailing                                                                                                                                                                                                                |
| 03/10/25           | 840                  | Certificate of Service re 1) Order Allowing Interim Compensation and Reimbursement of Expenses and 2) Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel |
| 03/17/25           | 847                  | Notice Lehotsky Keller Cohn LLP's Sixth Monthly Fee Statement for the Period February 1, 2025, through February 28, 2025                                                                                                                  |
| 03/18/25           | 848                  | Certificate of Service re Order Allowing Interim Compensation and Reimbursement of Expenses                                                                                                                                               |
| 03/18/25           | 856                  | Certificate of Service re Lehotsky Keller Cohn LLP's Sixth Monthly Fee Statement for the Period February 1, 2025, through February 28, 2025                                                                                               |
| 03/27/25           | 891                  | Objection of the Ad Hoc Group of SAFE Parties to Debtors' Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel                                             |
| 03/31/25           |                      | Hearing Set On (Related document(s):835 Application to Employ) Movant to notice all interested parties and file a certificate of service with the court. Hearing scheduled for 4/28/2025 at 03:00 PM at Houston, Courtroom 400            |
| 03/31/25           | 897                  | Notice of Hearing                                                                                                                                                                                                                         |
| 04/07/25           | 913                  | Certificate of Service re: 1) Agreed Mediation Order Appointing Judge Marvin Isgur as Mediator; and 2) Notice of Hearing                                                                                                                  |
| 04/08/25           | 927                  | Objection (Joinder of DLT Data Center 1 LLP to the Objection Filed by the Ad Hoc Group Parties to the Debtors Application for an Updated Order Authorizing the Retention                                                                  |

| Filing Date | Docket Number | Description on Docket                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|             |               | and Employment of Lehotsky Keller Cohn LLP As Special Litigation)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 04/14/25    | 945           | Certificate of Service                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 04/17/25    | 957           | Application for an Updated Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel (Attachments: # 1 Exhibit Declaration of Peter K. Stris # 2 Proposed Order)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 04/21/25    | 971           | Joint Emergency Motion of Debtors and Lehotsky Keller Cohn LLP to Continue Hearing on Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 04/22/25    | 997           | DOCKETED IN ERROR PER FILER. CORRECTED ENTRY FILED AT DKT. NO. 998. Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 04/22/25    | 998           | Corrected Response (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 04/23/25    | 999           | Reply / Lehotsky Keller Cohn LLP's Reply in Support of Joint Emergency Motion for Continuance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 04/23/25    |               | Hearing Set On (Related document(s):835 Application to Employ, 891 Objection, 927 Objection, 971 Emergency Motion, 998 Response, 999 Reply) Status conference to be held on 4/25/2025 at 11:30 AM at telephone and video conference                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 04/23/25    | 1000          | Courtroom Minutes. Time Hearing Held: 8:30 AM to 8:59 AM. Appearances: see log. Additional appearances: Mitch Hurley. Status Conference held. The Court inquires if the mediation is moving forward. Parties inform the Court that mediation is moving forward. The case manager will contact parties regarding the scheduling of a Status Conference regarding 835 Application to Employ. Debtor informs the Court the scheduling regarding deposition has been resolved by agreement. Parties address issues regarding Rule 2004 Deposition. Amended 2004 Notices to be filed by 4/24/2025 and a response to the issue raised by Ms. Tomasco the deposition should not go forward because of the pending |

| Filing Date | Docket Number | Description on Docket                                                                                                                                                                                                                                                                                               |
|-------------|---------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|             |               | proceeding rule is to be filed by 5/2/2025. The Court will schedule a hearing if needed otherwise it will enter an order                                                                                                                                                                                            |
| 04/23/25    | 1001          | PDF with attached Audio File                                                                                                                                                                                                                                                                                        |
| 04/23/25    |               | Notice of Time Change Only. Hearing Time Reset (Related document(s):835 Application to Employ, 891 Objection, 927 Objection, 971 Emergency Motion, 998 Response, 999 Reply) Status conference to be held on 4/25/2025 at 10:00 AM at telephone and video conference.                                                |
| 04/24/25    | 1017          | Statement of the Ad Hoc Group of SAFE Parties Regarding Status Conference Scheduled for April 25, 2025                                                                                                                                                                                                              |
| 04/24/25    | 1018          | Statement / Lehotsky Keller Cohn LLP's Statement in Connection with April 25, 2025 Status Conference                                                                                                                                                                                                                |
| 04/25/25    | 1024          | Courtroom Minutes. The hearing previously set regarding 835 Application to Employ for 4/28/2025 was cancelled on record. 835 Application to Employ is now set for 5/21/2025 at 1:00 PM. (Related document(s):835 Application to Employ) Hearing scheduled for 5/21/2025 at 01:00 PM at Houston, Courtroom 400 (ARP) |
| 04/25/25    | 1025          | PDF with attached Audio File                                                                                                                                                                                                                                                                                        |
| 04/25/25    | 1028          | Certificate of Service re: Documents Served on April 17, 2025                                                                                                                                                                                                                                                       |
| 05/08/25    | 1065          | Objection of the Ad Hoc Group of SAFE Parties to Debtors' Request to Replace Debtors' Counsel with Stris for LKC Retention Dispute                                                                                                                                                                                  |
| 05/12/25    |               | Hearing Set On (Related document(s):957 Generic Application) Movant to notice all interested parties and file a certificate of service with the court. Status conference to be held on 5/13/2025 at 11:00 AM at Houston, Courtroom 400                                                                              |
| 05/12/25    | 1076          | Notice of Status Conference                                                                                                                                                                                                                                                                                         |
| 05/12/25    | 1077          | Reply to Objection of the Ad Hoc Group of SAFE Parties to Debtors' Application for an Updated Order Authorizing the Retention of Employment of Stris & Maher LLP as Special Litigation Counsel                                                                                                                      |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 05/13/25           | 1083                 | Courtroom Minutes. Time Hearing Held: 11:00 am - 11:24 am. Appearances: See attached. Additional appearances: Trace Schmeltz, Darren Azman. The Court sets a deadline of 12:00 pm on 5/14/25 for additional filings relating to 957 after which the Court intends to rule on the papers. The Court discussed with the parties the possible bifurcation of 1057 into two separate hearings which will be discussed further at the hearing scheduled for 5/14/25 |
| 05/13/25           | 1085                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 05/14/25           | 1096                 | Docketed in Error - Statement of the Ad Hoc Group of SAFE Parties in Response to Debtors' Reply in Support of Debtors' Application for an Updated Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel                                                                                                                                                                                                            |
| 05/14/25           | 1097                 | Statement of the Ad Hoc Group of SAFE Parties in Response to Debtors' Reply in Support of Debtors' Application for an Updated Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel                                                                                                                                                                                                                                |
| 05/15/25           | 1105                 | Reply in Support of Debtors' Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel                                                                                                                                                                                                                                                                                               |
| 05/15/25           | 1106                 | Supplemental Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel                                                                                                                                                                                                                                                                                                                                                 |
| 05/16/25           | 1109                 | Transcript RE: Status Conference held on 5/13/25 before Judge Alfredo R. Perez.                                                                                                                                                                                                                                                                                                                                                                                |
| 05/16/25           | 1111                 | Reply in Support of Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel (Attachments: # 1 Declaration of Charles Topping)                                                                                                                                                                                                                                                      |
| 05/17/25           | 1116                 | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 05/19/25           | 1121                 | Witness List, Exhibit List (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10                                                                                                                                                                                                                                                                                    |

| Filing Date | Docket Number | Description on Docket                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|             |               | Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 # 17 Exhibit 17)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 05/19/25    | 1122          | Exhibit List, Witness List (Attachments: # 1 Exhibit 1 (Part 1 of 2) # 2 Exhibit 1 - Part 2 of 2 # 3 Exhibit 2 # 4 Exhibit 3 # 5 Exhibit 4 # 6 Exhibit 5 # 7 Exhibit 6 # 8 Exhibit 7 # 9 Exhibit 8 # 10 Exhibit 9 # 11 Exhibit 10 # 12 Exhibit 11 # 13 Exhibit 12 (Part 1 of 5) # 14 Exhibit 12 (Part 2 of 5) # 15 Exhibit 12 (Part 3 of 5) # 16 Exhibit 12 (Part 4 of 5) # 17 Exhibit 12 (Part 5 of 5) # 18 Exhibit 13 (Part 1 of 9) # 19 Exhibit 13 (Part 2 of 9) # 20 Exhibit 13 (Part 3 of 9) # 21 Exhibit 13 (Part 4 of 9) # 22 Exhibit 13 (Part 5 of 9) # 23 Exhibit 13 (Part 6 of 9) # 24 Exhibit 13 (Part 7 of 9) # 25 Exhibit 13 (Part 8 of 9) # 26 Exhibit 13 (Part 9 of 9) # 27 Exhibit 14 # 28 Exhibit 15 # 29 Exhibit 16 # 30 Exhibit 17 # 31 Exhibit 18 # 32 Exhibit 19 # 33 Exhibit 20 # 34 Exhibit 21 # 35 Exhibit 22 # 36 Exhibit 23 # 37 Exhibit 24 # 38 Exhibit 25 # 39 Exhibit 26 # 40 Exhibit 27 # 41 Exhibit 28 # 42 Exhibit 29 # 43 Exhibit 30 # 44 Exhibit 31 # 45 Exhibit 32 # 46 Exhibit 33 # 47 Exhibit 34 # 48 Exhibit 35 # 49 Exhibit 36 # 50 Exhibit 37 # 51 Exhibit 38 # 52 Exhibit 39 # 53 Exhibit 40 # 54 Exhibit 41 # 55 Exhibit 42) |
| 05/19/25    | 1123          | Witness List, Exhibit List (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 05/20/25    |               | Hearing Continued by Request (Related document(s):835 Application to Employ) Contacted by John Stokes. Movant to notice all interested parties and file a certificate of service with the court. Hearing scheduled for 6/4/2025 at 02:30 PM at Houston, Courtroom 400                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 05/20/25    | 1133          | Certificate of Service re Supplemental Order Authorizing the Retention and Employment of Stris & Maher LLP as Special Litigation Counsel                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 05/20/25    | 1134          | Notice of Hearing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 05/21/25    | 1141          | Exhibit List, Witness List (Attachments: # 1 Exhibit 46 # 2 Exhibit 47 # 3 Exhibit 48 # 4 Exhibit 49 # 5 Exhibit 50 # 6 Exhibit 51 # 7 Exhibit 52)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| Filing Date | Docket Number | Description on Docket                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 05/21/25    | 1142          | Sealed Document The Ad Hoc Group of SAFE Parties' Amended Witness and Exhibit List for the Hearing Scheduled for May 21, 2025 at 1:00 P.M. (CT)<br>(Attachments: # 1 Exhibit 46 # 2 Exhibit 47 # 3 Exhibit 48 # 4 Exhibit 49 (Part 1 of 2) # 5 Exhibit 49 (Part 2 of 2) # 6 Exhibit 50 # 7 Exhibit 51 # 8 Exhibit 52)                                                                                                                                                                                                                                                                                                                                                               |
| 05/22/25    | 1173          | Certificate of Service re 1) Debtors' Omnibus Objection to Claims Pursuant to Bankruptcy Code Sections 502(b), Bankruptcy Rule 3007, and Local Rule 3007-1 Because SAFE Holders Do Not Hold Claims and 2) Update Notice of Hearing                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 06/02/25    | 1220          | Exhibit List, Witness List (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 06/02/25    | 1222          | Witness List, Exhibit List (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 06/03/25    | 1227          | Certificate of Service re: Debtors Witness and Exhibit List for Hearing on Debtors Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 06/04/25    | 1228          | Exhibit List, Witness List (Attachments: # 1 Exhibit 10 # 2 Exhibit 11 # 3 Exhibit 12 # 4 Exhibit 13 # 5 Exhibit 14 # 6 Exhibit 15 (Part 1 of 3) # 7 Exhibit 15 (Part 2 of 3) # 8 Exhibit 15 (Part 3 of 3) # 9 Exhibit 16 # 10 Exhibit 17 # 11 Exhibit 18)                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 06/04/25    | 1230          | Courtroom Minutes. Time Hearing Held: 2:35 PM to 4:41 PM; 4:54 PM to 5:35 PM. Appearances: see log. Additional appearances: Joshua Wolfshoh. Witness sworn and testified: Charles Chuck Topping. Admitted exhibits: ECF Nos. 1105-4, 1220-1, 1222-1 through 1222-9, 1228-1 through 1228-11, and 1121-1 through 1121-17. Motion hearing held. Oral arguments heard. The Court takes Application 835 under advisement. The parties in support and parties in opposition of the application are to collaborate and submit a five-page brief (a total of 2 briefs only; not including the first page and signature page) highlighting the salient points by June 9, 2025 by 5:00 PM CST |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                                    |
|--------------------|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 06/09/25           | 1251                 | Order Extending Briefing Deadline                                                                                                                                                                                                               |
| 06/09/25           | 1252                 | PDF with attached Audio File                                                                                                                                                                                                                    |
| 06/09/25           | 1253                 | PDF with attached Audio File                                                                                                                                                                                                                    |
| 06/10/25           | 1258                 | Transcript RE: Amended Application to Employ Lehotsky Keller Cohn LLP as Special Litigation Counsel held on 6/4/25 before Judge Alfredo R. Perez                                                                                                |
| 06/10/25           | 1261                 | Supplemental Response In Support of Debtors' Application for Updated Order Authorizing Retention of LKC                                                                                                                                         |
| 06/10/25           | 1262                 | Supplemental Response / SAFE AHG Post-Hearing Submission on New Retention Application (Attachments: # 1 Tab A # 2 Tab B)                                                                                                                        |
| 06/11/25           | 1267                 | Certificate of Service re: 1) Document Request to Ad Hoc Group of SAFE Parties; and 2) Debtors and LKCs Post-Hearing Memorandum in Support of Application for Updated Order Authorizing Retention of LKC                                        |
| 06/11/25           | 1269                 | BNC Certificate of Mailing                                                                                                                                                                                                                      |
| 06/13/25           | 1279                 | BNC Certificate of Mailing                                                                                                                                                                                                                      |
| 07/08/25           | 1418                 | Order Granting Debtors' Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel                                                                                     |
| 07/10/25           | 1439                 | BNC Certificate of Mailing                                                                                                                                                                                                                      |
| 08/07/25           | 1515                 | Notice of Filed by Lehotsky Keller Cohn LLP's First Set of Requests for Production and Interrogatories to Debtors Pursuant to Bankruptcy Rule 2024                                                                                              |
| 08/14/25           | 1529                 | Motion for Status Conference on Rule 2004 Discovery                                                                                                                                                                                             |
| 08/14/25           | 1530                 | Motion to Quash LKC First Set of Requests for Production and Interrogatories [ECF 1515] and Response to LKC Motion for Status Conference [ECF 1529] (Attachments: # 1 Affidavit Declaration of Vincent P. Schmeltz # 2 Exhibit A # 3 Exhibit B) |

| Filing Date | Docket Number | Description on Docket                                                                                                                                                                                                                                                                                                                                                                                     |
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| 08/22/25    | 1560          | Final Application for Compensation for Lehotsky Keller Cohn LLP, Attorney, Period: 8/28/2024 to 6/30/2025, Fee: \$11419448.50, Expenses: \$252545.83. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Proposed Order)                                                                                                                 |
| 08/22/25    | 1561          | Sealed Document - 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 (Filed By Lehotsky Keller Cohn LLP). (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Proposed Order)                                         |
| 08/22/25    | 1562          | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order (I) Authorizing the Sealing of Second and Final Application and (II) Authorizing the Filing of a Redacted Version of Second and Final Fee Application (Attachments: # 1 Proposed Order)                                                                                                                                          |
| 08/29/25    | 1587          | Response - Lehotsky Keller Cohn LLP's Response to Special Committee's Motion to Quash Lehotsky Keller Cohn LLP's First Set of Requests for Production and Interrogatories to Debtors Pursuant to Bankruptcy Rule 2004 [ECF No. 1515] and Response to Lehotsky Keller Cohn LLP's Motion for Status Conference on Rule 2004 Discovery [ECF No. 1529] (Attachments: # 1 Exhibit 1 # 2 Proposed Order)        |
| 08/29/25    | 1588          | Sealed Document - Lehotsky Keller Cohn LLP's Response to Special Committee's Motion to Quash Lehotsky Keller Cohn LLP's First Set of Requests for Production and Interrogatories to Debtors Pursuant to Bankruptcy Rule 2004 [ECF No. 1515] and Response to Lehotsky Keller Cohn LLP's Motion for Status Conference on Rule 2004 Discovery [ECF No. 1529] (Attachments: # 1 Exhibit 1 # 2 Proposed Order) |
| 08/29/25    | 1589          | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order (I) Authorizing the Sealing of Response to Special Committee's Motion to Quash and (II) Authorizing the Filing of a Redacted Version of the Response (Attachments: # 1 Proposed Order)                                                                                                                                           |

| Filing Date | Docket Number | Description on Docket                                                                                                                                                                                                                                                                                                                                                                                                       |
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| 09/05/25    | 1614          | Reply in Support of its Motion to Quash the First Set of Requests for Production and Interrogatories to Debtors filed by LKC [ECF No. 1515]                                                                                                                                                                                                                                                                                 |
| 09/08/25    | 1622          | Order Setting Status Conference. Status conference to be held on 10/2/2025 at 09:00 AM at Houston, Courtroom 400                                                                                                                                                                                                                                                                                                            |
| 09/09/25    | 1623          | Order Setting Status and Scheduling Conference on All Pending Matters in the Referenced Chapter 11 Case                                                                                                                                                                                                                                                                                                                     |
| 09/10/25    | 1626          | Emergency Motion for an Extension to File a Response to Lehotsky Keller Cohn LLP's Final Application for Payment of Compensation and Reimbursement of Expenses (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                            |
| 09/10/25    | 1627          | Motion to Seal Emergency Motion for an Extension to Respond to Lehotsky Keller Cohn LLP's Final Application for Payment of Compensation and Reimbursement of Expenses (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                     |
| 09/10/25    | 1628          | Emergency Motion REDACTED re Motion for Extension to File a Response to Lehotsky Keller Cohn LLP's Final Application for Payment of Compensation and Reimbursement of Expenses (Attachments: # 1 Proposed Order)                                                                                                                                                                                                            |
| 09/11/25    |               | Hearing Set On (Related document(s):1628 Emergency Motion) Hearing scheduled for 10/2/2025 at 09:00 AM at Houston, Courtroom 400                                                                                                                                                                                                                                                                                            |
| 09/11/25    | 1631          | Transcript RE: Status Conference held on 9/8/25 before Judge Alfredo R. Perez. Transcript is available for viewing in the Clerk's Office. Within 21 days, parties are advised to comply with privacy requirements of Fed. R. Bank. P. 9037, ensuring that certain protected information is redacted from transcripts prior to their availability on PACER. Filed by Transcript access will be restricted through 12/10/2025 |
| 09/11/25    | 1632          | Response - Lehotsky Keller Cohn LLP's Response to Special Committee's Emergency Motion for Extension of Time (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Proposed Order)                                                                                                                                                                                                                                    |

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| 09/11/25           | 1633                 | Sealed Document - Lehotsky Keller Cohn LLP's Response to Special Committee's Emergency Motion for Extension of Time (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Proposed Order)                                                                                                                                                                      |
| 09/11/25           | 1634                 | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order (I) Authorizing the Sealing of Response to Special Committee's Emergency Motion for Extension of Time and (II) Authorizing the Filing of a Redacted Version of the Response (Attachments: # 1 Proposed Order)                                                                               |
| 09/11/25           | 1636                 | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                           |
| 09/11/25           | 1637                 | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                           |
| 09/12/25           | 1638                 | Response and Joinder of the Ad Hoc Group of SAFE Parties to the Special Committee's Emergency Motion for an Extension to File a Response to Lehotsky Keller Cohn LLP's Final Application for Payment of Compensation and Reimbursement of Expenses and Limited Objection to Lehotsky Keller Cohn's Motion to Seal Final Fee Application (Attachments: # 1 Exhibit A) |
| 09/18/25           | 1653                 | Certificate of Service of an unredacted copy of the Special Committees Motion for an Extension to File a Response to Lehotsky Keller Cohn LLPs Final Application for Payment of Compensation and Reimbursement of Expenses for the Period of August 28, 2024 through June 30, 2025                                                                                   |
| 09/19/25           | 1663                 | Motion to Seal Reply Brief in Further Support of its Emergency Motion for an Extension to Respond to Lehotsky Keller Cohn LLP's Final Fee Application and Authorizing the Filing of a Redacted Version of the Motion for an Extension (Attachments: # 1 Proposed Order)                                                                                              |
| 09/19/25           | 1665                 | Sealed Document Reply re Emergency Motion (Attachments: # 1 Exhibit 1)                                                                                                                                                                                                                                                                                               |
| 09/19/25           | 1666                 | Redacted Document By Barnes & Thornburg LLP (Attachments: # 1 Exhibit 1)                                                                                                                                                                                                                                                                                             |
| 09/22/25           | 1668                 | Response - Lehotsky Keller Cohn LLP's Response to Ad Hoc Group of Safe Parties' Response and Joinder to the                                                                                                                                                                                                                                                          |

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|                    |                      | Special Committee's Emergency Motion for Extension of Time (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                                                     |
| 09/22/25           | 1669                 | Sealed Document - Lehotsky Keller Cohn LLP's Response to Ad Hoc Group of Safe Parties' Response and Joinder to the Special Committee's Emergency Motion for Extension of Time (Attachments: # 1 Proposed Order)                                                                                                                                  |
| 09/22/25           | 1670                 | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order (I) Authorizing the Sealing of Response to Ad Hoc Group of Safe Parties' Response and Joinder to the Special Committee's Emergency Motion for Extension of Time and (II) Authorizing the Filing of a Redacted Version of the Response (Attachments: # 1 Proposed Order) |
| 09/22/25           | 1671                 | Order Granting the Special Committee's Motion for Entry of an Order Authorizing the Sealing of Its Reply in Brief in Further Support of Its Emergency Motion on an Extension to Respond to Lehotsky Keller Cohn LLP's Final Fee Application and Authorizing the Filing of a Redacted Version of the Motion for Extension                         |
| 09/23/25           | 1694                 | Order (I) Authorizing the Sealing of Response and (II) Authorizing the Filing of a Redacted Version of Response                                                                                                                                                                                                                                  |
| 09/23/25           | 1696                 | Courtroom Minutes. Time Hearing Held: 4:04 PM to 4:13 PM. Appearances: see log. Additional appearances; Trace Schmeltz, Michael Fox, and Joshua Wolfshohl. Status conference held. Oral argument heard on the record. The Court will calendar the fee application 1560/ 1561 for a hearing as the 10/2/2025, date approaches                     |
| 09/23/25           | 1697                 | Certificate of Service                                                                                                                                                                                                                                                                                                                           |
| 09/23/25           | 1702                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                     |
| 09/24/25           | 1714                 | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                       |
| 09/25/25           | 1718                 | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                       |
| 10/01/25           | 1732                 | Objection by Special Committee (Attachments: # 1 Declaration of Chris Wheeler # 2 Declaration of Chuck Topping)                                                                                                                                                                                                                                  |

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| 10/01/25           | 1733                 | Emergency Motion to Strike Privileged Information from Lehotsky Keller Cohn LLP's Second and Final Application for Payment of Compensation and Reimbursement of Expenses for the Period of August 28, 2024 through June 30, 2025 [ECF Nos. 1560-1561] (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                |
| 10/02/25           | 1735                 | Courtroom Minutes. Time Hearing Held: 9:00 am to 9:29 am. Appearances: see log. Additional appearances: Patricia "Patty" Tomasco, Joshua Wolfshohl, Todd Disher, Chase Potter, and Nathaniel Allard. Stats conference held. Oral argument heard on the record. The confirmation hearing will be set for 11/19/2025 at 1:00 pm. A conditional approval hearing is scheduled for 10/15/2025 at 4:30 pm by telephone and video conference. A hearing will be set for 1560/ 1561 for 10/30/2025 at 1:00 pm |
| 10/02/25           | 1737                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10/03/25           | 1743                 | Transcript RE: Status Conference held on 10/2/25 before Judge Alfredo R. Perez                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 10/06/25           | 1745                 | Order (I) Authorizing the Sealing of Response and (II) Authorizing the Filing of a Redacted Version of Response                                                                                                                                                                                                                                                                                                                                                                                        |
| 10/06/25           | 1746                 | Order Granting the Special Committee's Motion to Seal Its Emergency Motion for an Extension to Respond to Lehotsky Keller Cohn LLP's Final Application for Payment of Compensation and Reimbursement of Expenses                                                                                                                                                                                                                                                                                       |
| 10/08/25           | 1754                 | Response - Lehotsky Keller Cohn LLP's Response to Special Committee's Emergency Motion to Strike (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                                                                                                                                                                     |
| 10/08/25           | 1755                 | Sealed Document - Lehotsky Keller Cohn LLP's Response to Special Committee's Emergency Motion to Strike (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                                                                                                                                                              |
| 10/08/25           | 1756                 | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order (I) Authorizing the Sealing of Response to Special Committee's Emergency Motion to Strike and (II) Authorizing the Filing of a Redacted Version of the Response (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                             |

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| 10/08/25    | 1761          | BNC Certificate of Mailing                                                                                                                                                                                                                     |
| 10/08/25    | 1762          | BNC Certificate of Mailing                                                                                                                                                                                                                     |
| 10/13/25    | 1774          | Notice / Lehotsky Keller Cohn LLP's Cross-Notice of Deposition of Patricia Tomasco                                                                                                                                                             |
| 10/13/25    | 1777          | Emergency Motion to Continue Hearing on the Special Committee's Objection (Attachments: # 1 Exhibit B- Updated Offer Email # 2 Exhibit C- LKC Invoice Objection # 3 Exhibit D - Wolsfhohl Rejection Email)                                     |
| 10/13/25    | 1779          | Emergency Motion to Quash the Notices of Deposition of Patricia B. Tomasco (Attachments: # 1 Proposed Order)                                                                                                                                   |
| 10/14/25    |               | Hearing Set On (Related document(s):1776 Emergency Motion, 1777 Emergency Motion, 1779 Emergency Motion) Hearing scheduled for 10/15/2025 at 04:30 PM at Houston, Courtroom 400                                                                |
| 10/14/25    | 1782          | Notice of Hearing                                                                                                                                                                                                                              |
| 10/14/25    | 1783          | Exhibit List, Witness List                                                                                                                                                                                                                     |
| 10/14/25    | 1784          | Witness List, Exhibit List (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8)                                                                                      |
| 10/14/25    | 1785          | Exhibit List                                                                                                                                                                                                                                   |
| 10/14/25    | 1786          | Exhibit List                                                                                                                                                                                                                                   |
| 10/14/25    | 1787          | Response/Objection Filed by GR Fairbairn Family Trust, GRF Tiger Trust, Grant Fairbairn Revocable Trust, NC Fairbairn Family Trust, NCF Eagle Trust, Nina Claire Fairbairn Revocable Trust, Transcend Partners Legend Fund LLC, Valley High LP |
| 10/14/25    | 1788          | Response - Lehotsky Keller Cohn LLP's Response to Special Committee's Emergency Motion to Continue (Attachments: # 1 Proposed Order)                                                                                                           |
| 10/14/25    | 1789          | Emergency Motion - Lehotsky Keller Cohn LLP's Emergency Motion to Compel Responses to Discovery                                                                                                                                                |

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|             |               | Requests Filed by Interested Party Lehotsky Keller Cohn LLP (Attachments: # 1 Exhibit 1 # 2 Proposed Order)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10/15/25    |               | Hearing Set On (Related document(s):1789 Emergency Motion) Status conference to be held on 10/15/2025 at 04:30 PM at Houston, Courtroom 400                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10/15/25    | 1799          | Objection of the Ad Hoc Group of SAFE Parties to Lehotsky Keller Cohn LLP's Emergency Motion to Compel Responses to Discovery Requests                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10/15/25    | 1806          | Transcript RE: motion and status held on 9/23/25 before Judge ALFREDO R. PEREZ                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10/15/25    | 1807          | Certificate of Service re: Documents Served on October 14, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10/15/25    | 1808          | Certificate of Service re: Documents Served on October 14, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10/15/25    | 1810          | Courtroom Minutes. Time Hearing Held: 4:30 pm to 4:57 pm. Appearances: see log. Additional appearances: Trace Schmeltz, Joshua Wolfshohl, John Cone, Alexander Perez, and Nathaniel Allard. Oral discussions held on the record. If there are unresolved issues regarding the 30(b)(6) deposition, the Court will hold a virtual status conference on 11/14/2025. The debtor is to file an amended disclosure statement that will be set for hearing on 10/20/2025 at 3:00 pm and is virtual appearance only. Motion 1560 is reset for 11/4/2025 at 2:00 pm; if there are any discovery issues, the court will set a status conference. Mr. Schmeltz is to send a proposed order regarding the undisputed amount as stated on the record |
| 10/15/25    |               | Hearing Continued (Related document(s):1560 Application for Compensation) Hearing scheduled for 11/4/2025 at 02:00 PM at Houston, Courtroom 400 (ARP).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10/16/25    | 1811          | Notice of Service of Responses to First Set of Requests for Production and Interrogatories and Production of Documents                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10/17/25    | 1814          | Order (I) Authorizing the Sealing of Response to Ad Hoc Group of SAFE Parties' Response and Joinder to the Special                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|             |               | Committee's Emergency Motion for Extension of Time and (II) Authorizing the Filing of a Redacted Version of the Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10/17/25    | 1816          | Transcript RE: Emergency Motion Conditionally Approving the Adequacy of the Disclosure Statement; (B) Approving the Solicitation Procedures and Solicitation Packages; (C) Scheduling a Combined Hearing; (D) Establishing Procedures for Objection to the Plan and Final Approval of the Disclosure Statement; (E) Approving the Form, Manner, and Sufficiency of Notice of the Combined Hearing; and (F) Granting Related Relief; Emergency Motion to Compel Depositions; Emergency Motion to Continue Hearing on the Special Committee's Objection; Emergency Motion to Quash the Notices of Deposition of Patricia B. Tomasco held on 10/15/25 before Judge Alfredo R. Perez. |
| 10/19/25    | 1820          | Emergency Motion FOR ENTRY OF PROTECTIVE ORDER UNDER FEDERAL RULE OF EVIDENCE 502(d) Filed by Spec. Counsel Barnes & Thornburg LLP (Attachments: # 1 Proposed Order ORDER GRANTING EMERGENCY MOTION FOR ENTRY OF PROTECTIVE ORDER UNDER FEDERAL RULE OF EVIDENCE 502(d))                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10/19/25    | 1824          | Amended Emergency Motion FOR ENTRY OF PROTECTIVE ORDER UNDER FEDERAL RULE OF EVIDENCE 502(d) Filed by Spec. Counsel Barnes & Thornburg LLP (Attachments: # 1 Proposed Order ORDER GRANTING AMENDED EMERGENCY MOTION FOR ENTRY OF PROTECTIVE ORDER UNDER FEDERAL RULE OF EVIDENCE 502(d))                                                                                                                                                                                                                                                                                                                                                                                          |
| 10/19/25    | 1825          | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 10/19/25    | 1826          | Order Granting Amended Emergency Motion for Entry of Protective Order Under Federal Rule of Evidence 502 (d)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 10/20/25    | 1827          | Order Resetting Hearing. Hearing scheduled for 11/3/2025 at 02:00 PM at Houston, Courtroom 400                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 10/20/25    | 1829          | Courtroom Minutes. Time Hearing Held: 3:00 pm to 3:13 pm. Appearances: see log. Additional appearances: Joshua Wolfshohl and Ken Kansa. Conditional disclosure hearing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|             |               | held. Oral argument heard. The debtor is to upload a proposed order with the various attachments as stated on the record for the courts review and approval                                                                                                        |
| 10/20/25    | 1830          | PDF with attached Audio File                                                                                                                                                                                                                                       |
| 10/22/25    | 1860          | BNC Certificate of Mailing                                                                                                                                                                                                                                         |
| 10/22/25    | 1861          | BNC Certificate of Mailing                                                                                                                                                                                                                                         |
| 10/27/25    |               | Hearing Set On (Related document(s):1733 Emergency Motion). Hearing scheduled for 11/3/2025 at 02:00 PM at Houston, Courtroom 400                                                                                                                                  |
| 10/27/25    | 1871          | Transcript RE: Continued Hearing on Conditional Disclosure Statement held on October 20, 2025 before Judge Alfredo R. Perez                                                                                                                                        |
| 10/27/25    | 1873          | Notice of Filing of Proposed Order                                                                                                                                                                                                                                 |
| 10/27/25    | 1874          | Emergency Motion for Entry of a Protective Order Filed by Spec. Counsel Barnes & Thornburg LLP (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)                                                                                                            |
| 10/27/25    | 1875          | Notice of Service                                                                                                                                                                                                                                                  |
| 10/27/25    | 1876          | Emergency Motion, Motion to Seal Filed by Spec. Counsel Barnes & Thornburg LLP (Attachments: # 1 Proposed Order)                                                                                                                                                   |
| 10/28/25    |               | Hearing Set On (Related document(s):1874 Emergency Motion, 1876 Emergency Motion, Motion to Seal) Movant to notice all interested parties and file a certificate of service with the court. Hearing scheduled for 10/30/2025 at 04:00 PM at Houston, Courtroom 400 |
| 10/28/25    | 1881          | Motion to Enforce the Purchase and Sale Agreement with Whinstone US, Inc. filed by the Debtors and the Special Committee Filed by Debtor Rhodium Encore LLC (Attachments: # 1 Proposed Order)                                                                      |
| 10/28/25    | 1883          | Motion to Seal Filed by Spec. Counsel Barnes & Thornburg LLP                                                                                                                                                                                                       |

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| 10/28/25    | 1884          | Emergency Motion for Authority to Pay Fees to Lehotsky Keller & Cohn LLP                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 10/28/25    | 1885          | Sealed Document                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 10/29/25    | 1887          | Order Granting Emergency Motion for Authority to Pay Fees to Lehotsky Keller & Cohn LLP                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 10/29/25    | 1888          | Notice of Hearing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10/30/25    | 1895          | Witness List, Exhibit List (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3-20 # 4 Exhibit 21 # 5 Exhibit 22 # 6 Exhibit 23 # 7 Exhibit 24 # 8 Exhibit 25 # 9 Exhibit 26-28)                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 10/30/25    | 1896          | Sealed Document - Lehotsky Keller Cohn LLP's Witness and Exhibit List for Hearing on November 3, 2025 (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10 # 11 Exhibit 11 # 12 Exhibit 12 # 13 Exhibit 13 # 14 Exhibit 14 # 15 Exhibit 15 # 16 Exhibit 16 # 17 Exhibit 17 # 18 Exhibit 18 # 19 Exhibit 19 # 20 Exhibit 20 # 21 Exhibit 21 # 22 Exhibit 22 # 23 Exhibit 23 # 24 Exhibit 24 # 25 Exhibit 25 # 26 Exhibit 26 # 27 Exhibit 27 # 28 Exhibit 28)                                    |
| 10/30/25    | 1897          | Witness List                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10/30/25    | 1898          | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order Authorizing the Sealing of Witness and Exhibit List for November 3, 2025 Hearing (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                                                                                                                                                                                                           |
| 10/30/25    | 1899          | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 10/30/25    | 1900          | Courtroom Minutes. Time Hearing Held: 4:34 pm to 4:59 pm. Appearances: see log. Additional appearances: Joshua Wolfshohl and Paige Lohse. Emergency motion hearing held. Regarding motion 1876, the Court will grant the relief in part to specific items and specific testimony. Parties are to confer on what documents and testimony should be sealed. Regarding motion 1874, topic 8 was resolved on the record and topic 9 the production is to be made to active case participants as stated on the record. Movant made an oral request for an out of state witness to appear virtually. Unless |

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|                    |                      | the expert report and witness are available for deposition on 10/31/2025, the motion is denied                                                                                                                                                                                                                     |
| 10/30/25           | 1901                 | Sealed Document - Lehotsky Keller Cohn LLP's Reply in Support of its Final Fee Application (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Exhibit L # 13 Exhibit M # 14 Exhibit N) |
| 10/30/25           | 1902                 | Sealed Document - Declaration of Jonathan F. Cohn in Support of - Lehotsky Keller Cohn LLP's Reply in Support of its Final Fee Application                                                                                                                                                                         |
| 10/30/25           | 1903                 | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order Authorizing the Sealing of Reply in Support of Fee Application and Declaration of Jonathan F. Cohn (Attachments: # 1 Proposed Order)                                                                                                      |
| 10/31/25           | 1911                 | Sealed Document                                                                                                                                                                                                                                                                                                    |
| 10/31/25           | 1912                 | Sealed Document (Attachments: # 1 Exhibit 1 # 2 Exhibit 2 # 3 Exhibit 3 # 4 Exhibit 4 # 5 Exhibit 5 # 6 Exhibit 6 # 7 Exhibit 7 # 8 Exhibit 8 # 9 Exhibit 9 # 10 Exhibit 10)                                                                                                                                       |
| 10/31/25           | 1913                 | Sealed Document (Exhibit #s 11-20 to ECF 1912). (Attachments: # 1 Exhibit 12 # 2 Exhibit 13 # 3 Exhibit 14 # 4 Exhibit 15 # 5 Exhibit 16 # 6 Exhibit 17 # 7 Exhibit 18 # 8 Exhibit 19 # 9 Exhibit 20)                                                                                                              |
| 10/31/25           | 1914                 | Sealed Document (Exhibit #s 21-30 to ECF 1912) (Attachments: # 1 Exhibit 22 # 2 Exhibit 23 # 3 Exhibit 24 # 4 Exhibit 25 # 5 Exhibit 26 # 6 Exhibit 27 # 7 Exhibit 28 # 8 Exhibit 29 # 9 Exhibit 30)                                                                                                               |
| 10/31/25           | 1915                 | Sealed Document (Exhibit #s 31-40 to ECF 1912) (Attachments: # 1 Exhibit 32 # 2 Exhibit 33 # 3 Exhibit 34 # 4 Exhibit 35 # 5 Exhibit 36 # 6 Exhibit 37 # 7 Exhibit 38 # 8 Exhibit 39 # 9 Exhibit 40)                                                                                                               |
| 10/31/25           | 1916                 | Sealed Document (Exhibit #s 41-50 to ECF 1912) (Attachments: # 1 Exhibit 42 # 2 Exhibit 43 # 3 Exhibit 44 #                                                                                                                                                                                                        |

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|                    |                      | 4 Exhibit 45 # 5 Exhibit 46 # 6 Exhibit 47 # 7 Exhibit 48 # 8 Exhibit 49 # 9 Exhibit 50)                                                                                                                                                                                                                |
| 10/31/25           | 1917                 | Sealed Document (Exhibit #s 51-59 to ECF 1912)<br>(Attachments: # 1 Exhibit 52 # 2 Exhibit 53 # 3 Exhibit 54 # 4 Exhibit 55 # 5 Exhibit 56 # 6 Exhibit 57 # 7 Exhibit 58 # 8 Exhibit 59)                                                                                                                |
| 10/31/25           | 1918                 | Sealed Document (Exhibit #s 61-70 to ECF 1912)<br>(Attachments: # 1 Exhibit 62 # 2 Exhibit 63 # 3 Exhibit 64 # 4 Exhibit 65 # 5 Exhibit 66 # 6 Exhibit 67 # 7 Exhibit 68 # 8 Exhibit 69 # 9 Exhibit 70)                                                                                                 |
| 10/31/25           | 1919                 | Transcript RE: motion hearing held on 10/30/25 before Judge ALFREDO R. PEREZ.                                                                                                                                                                                                                           |
| 10/31/25           | 1920                 | Sealed Document (Exhibit #s 71-80 to ECF 1912)<br>(Attachments: # 1 Exhibit 72 # 2 Exhibit 73 # 3 Exhibit 74 # 4 Exhibit 75 # 5 Exhibit 76 # 6 Exhibit 77 # 7 Exhibit 78 # 8 Exhibit 79 # 9 Exhibit 80)                                                                                                 |
| 10/31/25           | 1921                 | Sealed Document (Exhibit #s 81-90 to ECF 1912)<br>(Attachments: # 1 Exhibit 82 # 2 Exhibit 83 # 3 Exhibit 84 # 4 Exhibit 85 # 5 Exhibit 86 # 6 Exhibit 87 # 7 Exhibit 88 # 8 Exhibit 89 # 9 Exhibit 90)                                                                                                 |
| 10/31/25           | 1922                 | Sealed Document (Exhibit #s 91-100 to ECF 1912)<br>(Attachments: # 1 Exhibit 92 # 2 Exhibit 93 # 3 Exhibit 94 # 4 Exhibit 95 # 5 Exhibit 96 # 6 Exhibit 97 # 7 Exhibit 98 # 8 Exhibit 99 # 9 Exhibit 100)                                                                                               |
| 10/31/25           | 1923                 | Sealed Document (Exhibit #s 101-115 to ECF 1912)<br>(Attachments: # 1 Exhibit 102 # 2 Exhibit 103 # 3 Exhibit 104 # 4 Exhibit 105 # 5 Exhibit 106 # 6 Exhibit 107 # 7 Exhibit 108 # 8 Exhibit 109 # 9 Exhibit 110 # 10 Exhibit 111 # 11 Exhibit 112 # 12 Exhibit 113 # 13 Exhibit 114 # 14 Exhibit 115) |
| 10/31/25           | 1924                 | Sealed Document (Exhibit #s 116-131 to ECF 1912)<br>(Attachments: # 1 Exhibit 117 # 2 Exhibit 118 # 3 Exhibit 119 # 4 Exhibit 120 # 5 Exhibit 122 # 6 Exhibit 122 # 7 Exhibit 123 # 8 Exhibit 124 # 9 Exhibit 125 # 10 Exhibit                                                                          |

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|             |               | 126 # 11 Exhibit 127 # 12 Exhibit 128 # 13 Exhibit 129 # 14 Exhibit 130 # 15 Exhibit 131)                                                                                                                                                                                                                                                                                                                                                      |
| 10/31/25    | 1925          | Motion to Seal Filed by Spec. Counsel Barnes & Thornburg LLP                                                                                                                                                                                                                                                                                                                                                                                   |
| 10/31/15    | 1926          | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 11/01/25    | 1927          | Sealed Motion SPECIAL COMMITTEES EMERGENCY MOTION TO LIMIT EVIDENCE RELIED UPON BY LEHOTSKY KELLER COHN LLP AT THE HEARING AND TO STRIKE THE REQUEST UNDER 11 U.S.C. § 328 FROM THEIR REPLY                                                                                                                                                                                                                                                    |
| 11/01/25    | 1928          | Sealed Document DECLARATION OF VINCENT (TRACE) SCHMELTZ IN SUPPORT OF THE SPECIAL COMMITTEES EMERGENCY MOTION TO LIMIT EVIDENCE RELIED UPON BY LEHOTSKY KELLER COHN LLP AT THE HEARING AND TO STRIKE THE REQUEST UNDER 11 U.S.C. § 328 FROM THEIR REPLY                                                                                                                                                                                        |
| 11/01/25    | 1929          | Motion to Seal SPECIAL COMMITTEES MOTION TO SEAL THE SPECIAL COMMITTEES EMERGENCY MOTION TO LIMIT EVIDENCE RELIED UPON BY LEHOTSKY KELLER COHN LLP AT THE HEARING AND TO STRIKE THE REQUEST UNDER 11 U.S.C. § 328 FROM THEIR REPLY                                                                                                                                                                                                             |
| 11/01/25    | 1930          | Notice OF WITHDRAWAL OF ANY CLAIM OF MISCONDUCT                                                                                                                                                                                                                                                                                                                                                                                                |
| 11/01/25    | 1931          | Sealed Document Exhibits A-J to ECF 1928<br>DECLARATION OF VINCENT (TRACE) SCHMELTZ IN SUPPORT OF THE SPECIAL COMMITTEES EMERGENCY MOTION TO LIMIT EVIDENCE RELIED UPON BY LEHOTSKY KELLER COHN LLP AT THE HEARING AND TO STRIKE THE REQUEST UNDER 11 U.S.C. § 328 FROM THEIR REPLY Under Seal<br>(Attachments: # 1 Exhibit B # 2 Exhibit C # 3 Exhibit D # 4 Exhibit E # 5 Exhibit F # 6 Exhibit G # 7 Exhibit H # 8 Exhibit I # 9 Exhibit J) |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                                                                                                         |
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| 11/01/25           | 1932                 | Emergency Motion - Lehotsky Keller Cohn LLP's Emergency Motion in Limine No. 1 to Exclude Documents and Testimony Related to Settlement Negotiations (Attachments: # 1 Proposed Order)                                                                                                                               |
| 11/02/25           | 1933                 | Sealed Motion - Lehotsky Keller Cohn LLP's Emergency Motion to Strike Special Committee's Expert Witness, Mike Rosten (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F # 7 Exhibit G # 8 Exhibit H # 9 Exhibit I # 10 Exhibit J # 11 Exhibit K # 12 Proposed Order) |
| 11/02/25           | 1934                 | Sealed Document - Declaration of Jonathan F. Cohn in Support of Lehotsky Keller Cohn LLP's Emergency Motion to Strike Special Committee's Expert Witness, Mike Rosten (Attachments: # 1 Attachment 1)                                                                                                                |
| 11/02/25           | 1935                 | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order Authorizing the Sealing of Emergency Motion to Strike and Declaration of Jonathan F. Cohn (Attachments: # 1 Proposed Order)                                                                                                                 |
| 11/02/25           | 1936                 | Sealed Document - Lehotsky Keller Cohn LLP's Response in Opposition to the Special Committee's Motion to Limit Evidence and to Strike (Attachments: # 1 Proposed Order)                                                                                                                                              |
| 11/02/25           | 1937                 | Declaration re: - Declaration of Jonathan F. Cohn in Support of - Lehotsky Keller Cohn LLP's Response in Opposition to the Special Committee's Motion to Limit Evidence and to Strike (Attachments: # 1 Exhibit A)                                                                                                   |
| 11/02/25           | 1938                 | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order Authorizing the Sealing of Response in Opposition to the Special Committee's Motion to Limit Evidence and to Strike and Declaration of Jonathan F. Cohn (Attachments: # 1 Proposed Order)                                                   |
| 11/03/25           | 1941                 | Motion to Seal SPECIAL COMMITTEES MOTION TO SEAL PROTECTED PLEADINGS                                                                                                                                                                                                                                                 |
| 11/03/25           | 1942                 | Sealed Document THE SPECIAL COMMITTEES REPLY IN SUPPORT OF ITS EMERGENCY MOTION TO LIMIT EVIDENCE RELIED UPON BY LEHOTSKY KELLER                                                                                                                                                                                     |

| Filing Date | Docket Number | Description on Docket                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|             |               | COHN LLP AT THE HEARING AND TO STRIKE THE REQUEST UNDER 11 U.S.C. § 328                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 11/03/25    | 1943          | Sealed Document NOTICE OF INTENT TO USE DECLARATIONS AS DIRECT TESTIMONY (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 11/03/25    | 1944          | Sealed Document SPECIAL COMMITTEES RESPONSE IN OPPOSITION TO LEHOTSKY KELLER COHN LLPS EMERGENCY MOTION TO STRIKE SPECIAL COMMITTEES EXPERT WITNESS, MIKE ROSTEN (ECF No. 1933) (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E # 6 Exhibit F)                                                                                                                                                                                                                                                                                                                                                                                                       |
| 11/03/25    | 1946          | Order (I) Authorizing the Sealing of Response to Special Committee's Emergency Motion to Strike and (II) Authorizing the Filing of a Redacted Version of the Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 11/03/25    | 1947          | Sealed Document SPECIAL COMMITTEES RESPONSE IN OPPOSITION TO LEHOTSKY KELLER COHN LLPS EMERGENCY MOTION IN LIMINE NO. 1 TO EXCLUDE DOCUMENTS AND TESTIMONY RELATED TO SETTLEMENT NEGOTIATIONS [ECF NO. 1932]                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 11/03/25    | 1949          | Motion to Seal Protected Pleadings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 11/03/25    | 1950          | Supplemental Notice of Intent to Use Declaration as Direct Testimony                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 11/03/25    | 1951          | Sealed Document Declaration of Mike Rosten                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 11/03/25    | 1955          | Courtroom Minutes. Time Hearing Held: 2:04 pm to 3:26 pm; 3:33 pm to 5:00 pm; 5:07 pm to 8:00 pm. Appearances: see log. Additional appearances: Chuck Topping, Chase Blackmon, Kevin Hays, David Eaton, Patricia "Patty" Tomasco, and Anna Richardson. Witnesses sworn and testified: Jonathan Jon Cohn, Chase Blackmon, and Chuck Topping. Admitted exhibits: Sealed ECF Nos. 1896-2, 1896-12, 1896-8, 1896-14, 1896-13, 1896-6, 1896-5, 1896-19, 1896-21; ECF Nos. 1895-21, 1897-259, 1897-307, 1897-201 (not admitted for the truth of the matter), 1897-245, 1897-212, and 1897-236. Judicial notice taken of ECF Nos. 1897-284. Emergency motion hearing held. Oral argument heard. |

| Filing Date | Docket Number | Description on Docket                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|             |               | Debtor is to provide the Court with a breakdown of the fees into the following categories: retention, fee apps that include time spent working on the objections to the fee app, and miscellaneous. Parties are to confer and produce an agenda containing the various pending motions related to this matter. Parties are also to confer about the estimated time needed for this matter and contact the case manager to schedule a hearing date. The Court will enter an order for the debtor to escrow the outstanding balance as stated on the record. Motion 1886 is going to be reset to a future date to be determined; parties are to contact the case manager |
| 11/04/25    | 1959          | Certificate of Service re: Documents Served on October 28, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 11/05/25    | 1970          | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 11/05/25    | 1972          | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 11/06/25    | 1973          | <b>**DOCKETED IN ERROR**</b> Transcript RE: fee application held on 11/3/25 before Judge ALFREDO R. PEREZ                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 11/06/25    | 1974          | Sealed Transcript RE: fee application held on 11/3/25 before Judge ALFREDO R. PEREZ                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 11/12/25    | 1984          | Hearing Set On (Related document(s):1560 Application for Compensation, 1561 Sealed Document) Movant to notice all interested parties and file a certificate of service with the court. Hearing scheduled for 12/3/2025 at 01:00 PM at Houston, Courtroom 400                                                                                                                                                                                                                                                                                                                                                                                                           |
| 11/13/25    | 1989          | Notice of Hearing Scheduled for December 3, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 11/19/25    | 2000          | Certificate of No Objection (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 11/20/25    |               | Hearing Set On (Related document(s):1881 Generic Motion, 2000 Certificate of No Objection) Movant to notice all interested parties and file a certificate of service with the court. Hearing scheduled for 11/25/2025 at 11:45 AM at telephone and video conference only                                                                                                                                                                                                                                                                                                                                                                                               |
| 11/20/25    | 2004          | Notice of Hearing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                                                                                                                               |
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| 11/21/25           | 2010                 | Objection - Lehotsky Keller Cohn LLP's Limited Objection to Plan and Reservation of Rights. (Attachments: # 1 Proposed Order)                                                                                                                                                                                                              |
| 11/24/25           | 2035                 | Order Granting the Motion to Seal Portions of the Emergency Motion for Authority to Pay Fees to Lehotsky Keller & Cohn LLP                                                                                                                                                                                                                 |
| 11/24/25           | 2037                 | Order Authorizing the Sealing of Lehotsky Keller Cohn LLP's Witness and Exhibit List for November 3, 2025 Hearing                                                                                                                                                                                                                          |
| 11/24/25           | 2038                 | Order Authorizing the Sealing of Lehotsky Keller Cohn LLP's Reply in Support of Fee Application and Declaration of Jonathan F. Cohn                                                                                                                                                                                                        |
| 11/25/25           | 2041                 | Order Granting the Motion to Seal Exhibits and Supplemented Witness and Exhibit Lists for the November 3, 2025 Hearing                                                                                                                                                                                                                     |
| 11/25/25           | 2042                 | Courtroom Minutes. Time Hearing Held: 11:46 am - 11:54 am. Appearances: See attached. Additional appearances: Nathaniel Allard for the Official Committee of Unsecured Creditors. Joshua Wolfshohl for Lehotsky Keller Cohn. Declaration to be filed as stated on the record. Counsel to contact case manager when the documents are filed |
| 11/26/25           | 2047                 | Order Granting the Motion to Seal Exhibits and Supplemented Witness and Exhibit Lists for the November 3, 2025 Hearing                                                                                                                                                                                                                     |
| 11/26/25           | 2048                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                               |
| 11/26/25           | 2049                 | Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology                                                                                                                                                                                                                                              |
| 11/26/25           | 2052                 | Certificate of Service re 1) Notice of Late Filing of Rhodium's Plan Supplement and 2) Certificate of No Objection                                                                                                                                                                                                                         |
| 11/26/25           | 2053                 | Certificate of Service re 1) Notice of Filing Plan Supplement for First 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; 2) Notice of                                                                                                  |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                          |
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|                    |                      | Hearing; and 3) Barnes & Thornburg LLP's Fourteenth Monthly Fee Statement for the Period October 1, 2025, Through October 31, 2025                                                                                    |
| 11/26/25           | 2056                 | BNC Certificate of Mailing                                                                                                                                                                                            |
| 11/26/25           | 2057                 | BNC Certificate of Mailing                                                                                                                                                                                            |
| 11/26/25           | 2058                 | BNC Certificate of Mailing                                                                                                                                                                                            |
| 11/27/25           | 2059                 | BNC Certificate of Mailing                                                                                                                                                                                            |
| 11/28/25           | 2060                 | BNC Certificate of Mailing                                                                                                                                                                                            |
| 12/01/25           | 2064                 | Notice of Filing Supplemental Exhibit (Attachments: # 1 Exhibit 1)                                                                                                                                                    |
| 12/01/25           | 2065                 | Witness List, Exhibit List                                                                                                                                                                                            |
| 12/01/25           | 2066                 | Objection - Lehotsky Keller Cohn LLP's Objection to the Ad Hoc Group of Safe Parties' Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology (Attachments: # 1 Proposed Order) |
| 12/01/25           | 2067                 | Order Granting Motion To Seal Protected Pleadings                                                                                                                                                                     |
| 12/01/25           | 2068                 | Order Authorizing the Sealing of Lehotsky Keller Cohn LLP's Emergency Motion to Strike and Declaration of Jonathan F. Cohn                                                                                            |
| 12/01/25           | 2069                 | Order Authorizing the Sealing of Lehotsky Keller Cohn LLP's Response in Opposition to Special Committee's Motion to Limit Evidence and to Strike and Declaration of Jonathan F. Cohn                                  |
| 12/01/25           | 2070                 | Order Granting the Motion to Seal Protected Pleadings                                                                                                                                                                 |
| 12/02/25           | 2090                 | Declaration re: of Mark Christopher Wheeler                                                                                                                                                                           |
| 12/02/25           | 2092                 | Agenda for Hearing on 12/3/2025                                                                                                                                                                                       |
| 12/02/25           | 2093                 | Transcript RE: held on 11/25/25 before Judge ALFREDO R. PEREZ                                                                                                                                                         |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 12/02/25           | 2101                 | Certificate of Service re: 1) The Plan Proponents Motion to Seal Confidential Information Included on the Plan Proponents Memorandum of Law in Support of Plan Confirmation, Joint Exhibit List for Hearings Scheduled for December 3, 2025, and the Declaration of Mitchell P. Hurley in Support of Plan Confirmation; 2) Declaration of Mark Christopher Wheeler; and 3) Agenda of Matters Set for Hearing on December 3, 2025, at 9:30 a.m.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12/03/25           | 2107                 | Amended Agenda for Hearing on 12/3/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 12/03/25           | 2113                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 12/03/25           | 2115                 | Courtroom Minutes. Time Hearing Held: 9:30 am to 11:53 am; 1:30 pm to 1:59 pm; 2:29 pm to 4:10 pm; 4:22 pm to 5:32 pm. Appearances: see log. Additional appearances: Kenneth "Ken" Kansa, Joshua Wolfshohl, Justin Camara, John Cone, Jacob Richards, Paige Lohse, and David Eaton. Sworn and testified witnesses: Michael Robinson, Mark "Chris" Wheeler, and Kevin Hayes. Admitted exhibits: ECF Nos. 2104-2 through 2104- 4, 2077-6 through 2104-8, 2104-27, 2104- 109 through 2104-111, 2104-14 through 2104-26, -29-28 through 2104-32, 2104-35 through 2104-80, 2104-91, 2104-93, 2104-95 through 2104-98, 2104-100 through 2104-107, 2104-108, 1897-216, 1897-244, 1896-17 (sealed), 1896-18 (sealed), and 1897-259. Judicial notice taken of 2104-5, 2104-13, and 2104-90. ECF No. 2050, 2063, 2074, and 2086 are admitted as direct testimony and are subject to cross examination. Confirmation and motion hearing held. Oral argument heard on the record. The Debtor shall file an exhibit list that cross-references each document with its corresponding ECF docket number. The plan is taken under advisement. Stipulation 2061 is terminated as moot. Application1560 is continued to a date to be determined; parties are to contact the case manager to coordinate a hearing date |
| 12/03/25           | 2118                 | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 12/03/25           | 2119                 | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 12/03/25           | 2120                 | BNC Certificate of Mailing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                                                                                     |
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| 12/03/25           | 2121                 | BNC Certificate of Mailing                                                                                                                                                                                                                                                                       |
| 12/03/25           | 2122                 | PDF with attached Audio File                                                                                                                                                                                                                                                                     |
| 12/03/25           | 2123                 | PDF with attached Audio File                                                                                                                                                                                                                                                                     |
| 12/03/25           | 2124                 | PDF with attached Audio File                                                                                                                                                                                                                                                                     |
| 12/09/25           | 2132                 | Notice OF INTENT TO ADDUCE TESTIMONY FROM A REMOTE LOCATION BY TELEPHONE AND VIDEO TECHNOLOGY (Attachments: # 1 Exhibit EXHIBIT A - Email re David Eaton Remote Testimony)                                                                                                                       |
| 12/10/25           |                      | Hearing Set On (Related document(s):1560 Application for Compensation, 1832 Amended Disclosure Statement, 1881 Generic Motion) Movants to notice all interested parties and file a certificate of service with the court. Hearing scheduled for 12/11/2025 at 01:00 PM at Houston, Courtroom 400 |
| 12/10/25           | 2136                 | Notice of Hearing Scheduled for December 11, 2025                                                                                                                                                                                                                                                |
| 12/10/25           | 2137                 | Transcript RE: hearing held on 12/3/25 before Judge ALFREDO R. PEREZ.                                                                                                                                                                                                                            |
| 12/11/25           | 2138                 | Amended Notice OF INTENT TO ADDUCE TESTIMONY FROM A REMOTE LOCATION BY TELEPHONE AND VIDEO TECHNOLOGY                                                                                                                                                                                            |
| 12/11/25           | 2139                 | Transcript RE: held on 12/03/25 before Judge ALFREDO R. PEREZ.                                                                                                                                                                                                                                   |
| 12/11/25           | 2140                 | Declaration re: Amended Declaration of Mark Christopher Wheeler                                                                                                                                                                                                                                  |
| 12/11/25           | 2141                 | Notice of Filing Proposed Order (Attachments: # 1 Exhibit A-Redlined Version # 2 Proposed Order Exhibit B-clean order)                                                                                                                                                                           |
| 12/11/25           | 2142                 | Courtroom Minutes. (Related document(s):1560 Application for Compensation) Hearing scheduled for 12/17/2025 at 01:00 PM at Houston, Courtroom 400                                                                                                                                                |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| 12/11/25           |                      | Hearing Set On (Related document(s):1881 Generic Motion) Hearing scheduled for 12/17/2025 at 01:00 PM at Houston, Courtroom 400                                                                                                                                                                                                                                                                                                                                                                                           |
| 12/11/25           | 2143                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 12/11/25           | 2144                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 12/11/25           | 2145                 | Certificate of Service re: Documents Served on December 1, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 12/11/25           | 2146                 | Certificate of Service re: Documents Served on December 3, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 12/15/25           | 2150                 | Transcript RE: held on 12/11/25 before Judge ALFREDO R. PEREZ.                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 12/15/25           | 2151                 | Response - Lehotsky Keller Cohn LLP's Response to Amended Declaration of Mark Christopher Wheeler and Brief in Support of its Objection to Debtors' Proposed Plan. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Proposed Order)                                                                                                                                                                                                                                                                            |
| 12/16/25           | 2152                 | Motion to Proffer Evidence Filed by Spec. Counsel Barnes & Thornburg LLP (Attachments: # 1 Exhibit A (Deposition Notices) # 2 Exhibit B (Kevin Hays Deposition) # 3 Exhibit C (Topping Deposition) # 4 Exhibit D (Eaton Deposition) # 5 Exhibit E (Mike Rosten Deposition Transcript) # 6 Exhibit F (Hearing Transcript) # 7 Exhibit G (Email with BOD Minutes) # 8 Exhibit H (Hearing Transcript) # 9 Exhibit I (Hearing Transcript) # 10 Exhibit J (Proposed Trial Exhibit 334) # 11 Exhibit K (Special Committee LKC)) |
| 12/16/25           | 2156                 | Response - Lehotsky Keller Cohn LLP's Response to the Special Committee's Proffer to Admit Evidence. (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Proposed Order)                                                                                                                                                                                                                                                                                                                                          |
| 12/16/25           | 2157                 | Sealed Document - Lehotsky Keller Cohn LLP's Response to the Special Committee's Proffer to Admit Evidence                                                                                                                                                                                                                                                                                                                                                                                                                |

| <b>Filing Date</b> | <b>Docket Number</b> | <b>Description on Docket</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|                    |                      | (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Proposed Order)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 12/16/25           | 2158                 | Motion to Seal - Lehotsky Keller Cohn LLP's Motion for Entry of an Order (I) Authorizing the Sealing of Response to the Special Committee's Proffer to Admit Evidence and (II) Authorizing Filing of a Redacted Version of the Response (Attachments: # 1 Proposed Order)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 12/17/25           | 2159                 | Response THE SPECIAL COMMITTEES RESPONSE IN OPPOSITION TO LEHOTSKY KELLER COHN LLPS RESPONSE TO AMENDED DECLARATION OF MARK CHRISTOPHER WHEELER AND BRIEF IN SUPPORT OF ITS OBJECTION TO DEBTORS PROPOSED PLAN                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 12/17/25           | 2160                 | Statement of the Safe AHG and the Transcend Group Concerning LKC Fee Dispute                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12/17/25           | 2161                 | Courtroom Minutes. Time Hearing Held: 1:00 pm to 2:53 pm; 2:59 pm to 3:16 pm; 3:48 pm to 3:56 pm. Appearances: see log. Additional appearances: Joshua Wolfshohl, Todd Disher, Jon Cohn, Chase Potter, Nathaniel Allard, and Paige Lohse. Admitted exhibits: Lehotsky Keller Cohn LLP exhibit 5 (ECF No.1896-5) and 18 (ECF No. 1896-18) (unredacted version and the admission does not affect the privilege). Motion hearing held. Oral argument heard on the record. The plan is confirmed and the fees are rewarded. The debtor is to upload a new confirmation order and the SAFE AHG is to upload an order regarding the fees. The Motion to Enforce 1881 is granted in part and the debtor is to upload a proposed form of order as stated on the record. Application 1560 is granted as filed; movant, Lehotsky Keller Cohn LLP, is to upload a proposed form of order |
| 12/17/25           | 2162                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12/17/25           | 2163                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12/17/25           | 2164                 | PDF with attached Audio File                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 12/24/25           | 2196                 | Notice of Proposed Final Order Allowing Compensation and Reimbursement of Expenses. (Attachments: # 1 proposed Final Order)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| Filing Date | Docket Number | Description on Docket                                                                                                                                                                                                                                              |
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| 12/24/25    | 2198          | Final Order Allowing Compensation and Reimbursement of Expenses                                                                                                                                                                                                    |
| 12/26/25    | 2199          | Certificate of Service re: 1) Amended Declaration of Mark Christopher Wheeler; and 2) Notice of Filing Proposed Order                                                                                                                                              |
| 12/26/25    | 2203          | BNC Certificate of Mailing                                                                                                                                                                                                                                         |
| 01/02/26    | 2210          | Transcript RE: held on 12/17/25 before Judge ALFREDO R. PEREZ.                                                                                                                                                                                                     |
| 01/07/26    | 2213          | Notice of Appeal filed                                                                                                                                                                                                                                             |
| 01/07/26    |               | Receipt of Notice of Appeal ( 24-90448) [appeal,ntcapl] (298.00) Filing Fee. Receipt number B26808177. Fee amount \$ 298.00                                                                                                                                        |
| 01/07/26    | 2214          | Notice of Appeal filed                                                                                                                                                                                                                                             |
| 01/07/26    |               | Receipt of Notice of Appeal( 24-90448) [appeal,ntcapl] (298.00) Filing Fee. Receipt number A26808355. Fee amount \$ 298.00                                                                                                                                         |
| 01/07/26    | 2215          | Election to Appeal to District Court                                                                                                                                                                                                                               |
| 01/08/26    | 2217          | Election to Appeal to District Court                                                                                                                                                                                                                               |
| 01/12/25    | 2221          | *Withdrawn* Motion - Lehotsky Keller Cohn LLP's Motion for Order Directing Payment of Fees and Expenses (Attachments: # 1 Exhibit A # 2 Proposed Order)                                                                                                            |
| 01/12/25    | 2222          | Order Granting Lehotsky Keller Cohn LLP's Motion for Entry of an Order (I) Authorizing the Sealing of Response to the Special Committee's Proffer to Admit Evidence and (II) Authorizing Filing of a Redacted Version of the Response                              |
| 01/12/26    | 2243          | Clerk's Notice of Filing of an Appeal. On 01/07/2026, The Special Committee of the Board of Directors of Debtor Rhodium Enterprises, Inc. filed a notice of appeal. The appeal has been assigned to U.S. District Judge George C Hanks, Jr, Civil Action 26cv0233. |
| 01/12/26    | 2244          | Clerk's Notice of Filing of an Appeal. On 01/07/2026, The Ad Hoc Group of SAFE Parties filed a notice of appeal. The                                                                                                                                               |

| Filing Date | Docket Number | Description on Docket                                                                                                             |
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|             |               | appeal has been assigned to U.S. District Judge George C Hanks, Jr, Civil Action 25cv0235.                                        |
| 01/13/26    | 2246          | Transcript RE: status conference held on 4/25/25 before Judge ALFREDO R. PEREZ                                                    |
| 01/14/26    | 2248          | BNC Certificate of Mailing                                                                                                        |
| 01/15/25    | 2268          | Notice of Receipt of Payment and Withdrawal of Lehotsky Keller Cohn LLP's Motion for Order Directing Payment of Fees and Expenses |
| 01/15/26    | 2270          | BNC Certificate of Mailing                                                                                                        |
| 01/15/26    | 2271          | BNC Certificate of Mailing                                                                                                        |

#### **STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL**

Whether the Bankruptcy Court erred in granting Debtors' *Application for an Updated Order Authorizing the Retention and Employment of Lehotsky Keller Cohn LLP as Special Litigation Counsel* [Dkt. No. 835]?

#### **RESERVATION OF RIGHTS**

The SAFE AHG reserves the right to amend, modify, and supplement the foregoing designations and issues on appeal and to adopt the designations or issues identified by any other party in connection with the appeal of the Final Order.

Dated: January 21, 2026

Respectfully Submitted,

**AKIN GUMP STRAUSS HAUER & FELD LLP**

/s/ Mitchell P. Hurley

Mitchell P. Hurley (admitted *pro hac vice*)

One Bryant Park

New York, NY 10036-6745

Telephone: (212) 872-1000

Email: [mhurley@akingump.com](mailto:mhurley@akingump.com)

- and -

Sarah Link Schultz (State Bar No. 24033047;  
S.D. Tex. 30555)

Elizabeth D. Scott (State Bar No. 24059699;  
S.D. Tex. 2255287)

2300 N. Field Street, Suite 1800

Dallas, TX 75201-2481

Telephone: (214) 969-2800

Email: [sschultz@akingump.com](mailto:sschultz@akingump.com)

Email: [edscott@akingump.com](mailto:edscott@akingump.com)

*Counsel to the Ad Hoc Group of SAFE Parties*

**Certificate of Service**

I hereby certify that on January 21, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Mitchell P. Hurley  
Mitchell P. Hurley