

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

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

**LEHOTSKY KELLER COHN LLP’S DESIGNATION OF ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), Lehotsky Keller Cohn LLP (“*LKC*”), as special litigation counsel in the above-captioned chapter 11 cases (the “*Chapter 11 Cases*”), respectfully submits the following designation of items to be included in the record on appeal, in reference to the Notices of Appeal filed by the Special Committee of the Board of Directors of Rhodium Enterprises Inc. and the Ad Hod Group of SAFE Parties on January 7, 2026 (ECF Nos. 2213, 2214), of the *Final Order Allowing Compensation and Reimbursement of Expenses* to Lehotsky Keller Cohn LLP (ECF 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.

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



DESIGNATIONS TO BE INCLUDED IN THE RECORD ON APPEAL

LKC 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.

Filing Date	Docket Number	Description on Docket
02/10/2025	763	Second Interim Order on Phase 1 of Motion to Assume Executory Contracts.
02/11/2025	770	Adversary Case 25-03047, Complaint by Rhodium JV LLC, Rhodium 30MW LLC, Rhodium 2.0 LLC, Rhodium 10MW LLC, Rhodium Encore LLC, Air HPC LLC, Jordan HPC LLC, Rhodium Industries LLC, Rhodium Renewables LLC against Whinstone US, Inc., Riot Platforms, Inc.
11/03/2025	1955	All exhibits admitted during the Court's November 3, 2025 hearing.
12/03/2025	2115	All exhibits admitted during the Court's December 3, 2025 hearing.
12/11/2025	2142	All exhibits admitted during the Court's December 11, 2025 hearing.
12/17/2025	2161	All exhibits admitted during the Court's December 17, 2025 hearing, including but not limited to Special Committee Exhibit 334 and LKC Exhibit 19.

RESERVATION OF RIGHTS

LKC reserves the right to amend, modify, and supplement the foregoing designations and to adopt the designations identified by any other party in connection with the appeal of the Final Order.

Dated: February 4, 2026
Houston, Texas

Respectfully submitted,

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl (TX Bar No. 24038592)

Michael B. Dearman (TX Bar No. 24116270)

PORTER HEDGES LLP

1000 Main Street, 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Facsimile: (713) 226-6248

jwolfshohl@porterhedges.com

mdearman@porterhedges.com

Counsel to Lehotsky Keller Cohn LLP

CERTIFICATE OF SERVICE

I hereby certify that, on February 4, 2026, a true and correct copy of the foregoing document was served via email through the Bankruptcy Court's Electronic Case Filing System on the parties that have consented to such service.

/s/ Joshua W. Wolfshohl
Joshua W. Wolfshohl