

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

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

**STIPULATION BETWEEN THE WIND DOWN DEBTOR
AND QUINN EMANUEL URQUHART & SULLIVAN, LLP**
[Relates to Docket Nos. 264 and 2324]

The Wind Down Debtor² and Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel,” and with the Wind Down Debtor, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as set for below in this stipulation (the “Stipulation”).

RECITALS

1. On February 27, 2026, Quinn Emanuel filed its *Fifth and Final Application for Payment of Compensation and Reimbursement of Expenses* [Docket No. 2324] seeking allowance and approval of certain compensation to Quinn Emanuel on an interim and final basis, and reimbursement of certain expenses (the “Application”). Utilizing the Court’s negative notice procedures, the Application sets the deadline to object or otherwise respond to the Application as Friday, March 20, 2026 – the 21st day after Quinn Emanuel’s filing of the Application (the

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

² The term “Wind Down Debtor,” when used herein, refers to Rhodium Enterprises, Inc.



“Response Deadline”).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

1. Notwithstanding the Response Deadline or any other contrary response deadline the Parties agree that the Wind Down Debtor may file an objection or any other response to the Application on or before **Thursday, June 18, 2026.**

STIPULATED AND AGREED:

/s/ Chase J. Potter

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