

**IN THE UNITED STATES BANKRUPTCY COURT
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 LEHOTSKY KELLER COHN LLP
AND BARNES & THORNBURG LLP
[Relates to ECF No. 2358]**

Lehotsky Keller Cohn LLP (“LKC”) and Barnes & Thornburg LLP (“B&T”) (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as set forth below:

RECITALS

1. On February 12, 2026, LKC filed its *Application for Allowance of Chapter 11 Administrative Expense Claims* (ECF No. 2299) (“Admin Claim”).
2. On February 13, 2026, LKC filed its *Motion for Sanctions Against the Special Committee of Rhodium Enterprises, Inc.’s Board of Directors and Its Counsel Barnes & Thornburg LLP, or, in the Alternative, for Payment of Fees and Expenses under Section 328* (ECF Nos. 2302–2303) (“Sanctions Motion”).
3. On February 13, 2026, LKC filed its *Adversary Complaint for Damages* (ECF No. 2305) (the “Complaint”).

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.



4. On February 27, 2026, B&T filed its *Fifth and Final Fee Application of Barnes & Thornburg LLP as Counsel to the Special Committee of Rhodium Enterprises, Inc. Board of Directors for the Fee Period from September 1, 2025 through January 14, 2026 and the Final Period from August 24, 2024 through January 14, 2026* (ECF No. 2332) (“B&T’s Application”).

5. On March 19, 2026, LKC filed its *Limited Objection to Fifth and Final Fee Application of Barnes & Thornburg LLP as Counsel to the Special Committee of Rhodium Enterprises, Inc. Board of Directors for the Fee Period from September 1, 2025 through January 14, 2026 and the Final Period from August 24, 2024 through January 14, 2026 and Reservation of Rights* (ECF No. 2358) (the “Limited Objection”).

6. B&T disputes the characterizations of B&T’s conduct in LKC’s Limited Objection.

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

1. LKC withdraws its Limited Objection.

2. The withdrawal of LKC’s Limited Objection does not constitute or contain any findings with respect to any conduct of the Special Committee, B&T, or the Ad Hoc Group of SAFE Parties that is the subject of LKC’s Sanctions Motion, Admin Claim, and/or Complaint.

3. The withdrawal of LKC’s Limited Objection does not estop, bar, or otherwise prejudice either of the Parties with respect to the allegations and claims in the Sanctions Motion, Admin Claim, and/or Complaint.

4. The Court’s order, if any, approving B&T’s Application shall provide (if and to the extent acceptable to the Court):

a. Such order does not constitute or contain any findings with respect to any conduct of the Special Committee, B&T, or the Ad Hoc Group of SAFE Parties

that is the subject of LKC's Sanctions Motion, Admin Claim, and/or Complaint;
and

- b. Nothing in such order estops, bars, or otherwise prejudices either of the Parties with respect to the allegations and claims in the Sanctions Motion, Admin Claim, and/or Complaint.

STIPULATED AND AGREED:

BECK REDDEN LLP

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument was served upon counsel of record on April 8, 2026, in accordance with the Federal Rules of Civil Procedure.

/s/ David T. Judd _____
David T. Judd