

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

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

**SECOND STIPULATION BETWEEN THE WIND DOWN DEBTOR  
AND MCDERMOTT WILL & SCHULTE LLP**

**[Relates to Dkt. Nos. 264, 2327, and 2361]**

The Wind Down Debtor<sup>2</sup> and McDermott Will & Schulte LLP (“McDermott,” 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 October 14, 2024, this Court entered its *Order Granting the Motion of the Debtors to Establish Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Dkt. No. 264] (the “Compensation Procedures Order”). The Compensation Procedures Order sets out the procedures for Interim and Final Fee Applications (as those terms are utilized within the Compensation Procedures Order).

2. On March 2, 2026, McDermott filed its *Twelfth and Thirteenth Monthly and Final*

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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), 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”).

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



*Application of McDermott Will & Schulte LLP as Counsel to the Official Committee of Unsecured Creditors* [Dkt. No. 2327] seeking allowance and approval of certain compensation to McDermott 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 for any party to object or otherwise respond to the Application as Monday, March 23, 2026 – the 21st day after McDermott’s filing of the Application (the “Original Response Deadline”).

3. On March 20, 2026, the Parties filed their *Stipulation Between the Wind Down Debtor and McDermott Will & Schulte LLP* [Dkt. No. 2361] (the “First Stipulation”) stipulating to an extension of the Original Response Deadline, or any other contrary response deadline, to Wednesday, April 22, 2026 (the “Extended Response Deadline”).

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

1. Notwithstanding the Extended Response Deadline or any other contrary response deadline, the Parties have agreed that the Wind Down Debtor’s deadline to file an objection or any other response to the Application is extended to **Wednesday, May 13, 2026**.

**[Remainder of page left intentionally blank – Signatures to follow]**

**STIPULATED AND AGREED:**

/s/ Chase J. Potter

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