Case 25-03047 Document 22 Filed in TXSB on 02/21/25 Page 1 of 3 Docket #0022 Date Filed: 2/20/2025

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

In re:

# RHODIUM ENCORE LLC, et al.<sup>1</sup>

#### Chapter 11

Case No. 24-90448 (ARP)

(Jointly Administered)

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 and	ş
RHODIUM RENEWABLES LLC,	§
	§
Plaintiff,	§

Adversary No. 25-03047

vs.

WHINSTONE US, INC. and RIOT PLATFORMS, INC.

Defendants

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

§ §

PLEASE TAKE NOTICE that Mark C. Moore and the law firm of Foley & Lardner LLP

appear in this matter as counsel for Whinstone US, Inc. ("Whinstone"), and request that all notices

given or required to be given in this case and all papers served or required to be served in this case

be given to and served upon them at the following address:

Robert T. Slovak (TX 24013523) Steven C. Lockhart (TX 24036981) J. Michael Thomas (TX 24066812) Mark C. Moore (TX 24074751)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF P



<sup>&</sup>lt;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). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

FOLEY & LARDNER LLP 2021 McKinney Avenue, Suite 1600 Dallas, TX 75201 Telephone: (214) 999-3000 Facsimile: (214) 999-4667 rslovak@foley.com slockhart@foley.com jmthomas@foley.com mmoore@foley.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes notices and papers referred to in the Federal Rules of Civil Procedure and/or the Federal Rules of Bankruptcy Procedure and includes, without limitation, any notices of hearings, orders, pleadings, motions, applications, complaints, demands, requests, petitions, disclosure statements, memoranda, briefs and any other documents brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, hand delivery, telephone, telecopier, telegraph, or telex.

This *Notice of Appearance and Request for Service of Papers* shall not be deemed or construed to be a waiver of the rights of Whinstone: (i) to seek remand or similar relief in connection with this removed matter, (ii) to have final orders in non-core matters entered only after de novo review by a District Judge, (iii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (iv) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal. All other rights, claims, actions, setoffs, or recoupments to which Whinstone is or may be entitled, in law or in equity, are expressly reserved.

DATED: February 21, 2025

Respectfully submitted by:

/s/ Mark C. Moore Robert T. Slovak (TX 24013523) Steven C. Lockhart (TX 24036981) J. Michael Thomas (TX 24066812) Mark C. Moore (TX 24074751) FOLEY & LARDNER LLP 2021 McKinney Avenue, Suite 1600 Dallas, TX 75201 Telephone: (214) 999-3000 Facsimile: (214) 999-4667 rslovak@foley.com slockhart@foley.com jmthomas@foley.com mmoore@foley.com

### COUNSEL FOR WHINSTONE US, INC.

## **CERTIFICATE OF SERVICE**

I certify that I caused the foregoing document to be filed on February 21, 2025, using the

Court's CM/ECF System which caused it to be served upon those parties registered in the system

to receive such service.

<u>/s/ Mark C. Moore</u> Mark C. Moore