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

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

### NOTICE OF APPEARANCE UNDER FED. R. BANKR. P. 9010(B), REQUEST FOR ALL COPIES UNDER FED. R. BANKR. P. 2002 AND REQUEST FOR ALL PLEADINGS UNDER FED. R. BANKR. P. 3017(A)

Lehotsky Keller Cohn LLP by and through its undersigned counsel, requests that all notices given or required to be given and all papers served or required to be served by U.S. Mail and by email in the above-captioned case be given to and served upon:

> Joshua W. Wolfshohl Michael B. Dearman PORTER HEDGES LLP 1000 Main St., 36th Floor Houston, TX 77002 Tel: (713) 226-6000 jwolfshohl@porterhedges.com mdearman@porterhedges.com

This request encompasses all notices, copies and pleadings referred to in section 1109(b) of Title 11, United States Code or in Rules 2002, 3017 or 9007 of the Bankruptcy Rules of Procedure, including, without limitation, any and all notices of any orders, motions, demands, complaints, petitions, pleadings, plans of reorganization, disclosure statements, requests, or applications, and any other documents brought before this Court in this case, whether formal or

<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 (5868), Rhodium Ready Ventures LLC (8618), Rhodium Industries LLC (4771), Rhodium Encore Sub LLC (1064), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LC (5210), Photoin 100 W Sub LLC (1064), Rhodium HPC Sub LLC (1064), Rhodium 2.0 Sub LC (1064), Rhodium 2.0 S



#### Case 24-90448 Document 901 Filed in TXSB on 04/03/25 Page 2 of 3

informal, written or oral, or transmitted or conveyed by mail, hand delivery, delivery service, email, telephone, fax, telex or otherwise which affect or seek to affect the above case.

This Notice of Appearance and Request for Notices is not, and shall not be deemed or construed to be, a waiver of any of Lehotsky Keller Cohn LLP's substantive or procedural rights, including without limitation, Lehotsky Keller Cohn LLP's rights: (i) to have final orders in noncore matters entered only after de novo review by a United States district judge, (ii) to trial by jury in any proceedings so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) to contest jurisdiction or venue in this case or in any case, controversy, or proceeding related to these cases, (v) to have documents served in accordance with Federal Rule of Bankruptcy Procedure 7004 and Federal Rule of Civil Procedure 4, or (vi) to any rights, claims, actions, defenses, setoffs, or recoupments to which Lehotsky Keller Cohn LLP is or may be entitled, under any agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

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<sup>(3827),</sup> 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.

Dated: April 3, 2025.

Respectfully submitted,

## PORTER HEDGES LLP

<u>/s/ Joshua W. Wolfshohl</u> Joshua W. Wolfshohl (TX Bar No. 24038592) Michael B. Dearman (TX Bar No. 24116270) 1000 Main St., 36th Floor Houston, TX 77002 Tel: (713) 226-6000 Fax: (713) 226-6295 jwolfshohl@porterhedges.com mdearman@porterhedges.com

Counsel for Lehotsky Keller Cohn LLP

# **CERTIFICATE OF SERVICE**

I hereby certify that this Notice of Appearance was electronically filed and served to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District on April 3, 2025.

<u>/s/ Joshua W. Wolfshohl</u> Joshua W. Wolfshohl