

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:

Chapter 11

Rhodium Encore LLC, *et al.*<sup>1</sup>

Case No. 24-90448 (ARP)

(Jointly Administered)

Debtors.

**MOTION TO WITHDRAW AS COUNSEL FOR LIQUID MINING GROUP  
AND FOR RELIEF FROM AGREED MEDIATION ORDER**

Michael D. Lessne (“**Lessne**”) and Lessne Hoffman, PLLC (“**LH**”), Constantine Economides (“**Economides**”) and Dynamis LLP (“**Dynamis**”), and Liquid Mining Fund I, LLC (“**LMF I**”), Liquid Mining Fund II, LLC (“**LMF II**”), and Liquid Mining Fund III, LLC (“**LMF III**”) and together with LMF I and LMF II, the “**Liquid Mining Group**”) moves (1) on an agreed basis, for approval for LH and Dynamis to withdraw as counsel for the Liquid Mining Group and (2) for Liquid Mining Group to be relieved from all obligations under the Agreed Mediation Order (ECF No. 966), and states:

1. Economides and Dynamis and Lessne and LH (collectively, the “**Attorneys**”) are co-counsel for the Liquid Mining Group in these bankruptcy proceedings. On April 9, 2025, (a) Economides was admitted *pro hac vice* by Court Order (ECF No. 930) and (b) Lessne was admitted *pro hac vice* by Court Order (ECF No. 931).

2. The Attorneys have irreconcilable differences with the Liquid Mining Group.

<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. (“**REI**”) (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.



3. The Attorneys, with the agreement of the Liquid Mining Group, request the entry of an Order authorizing and confirming the withdrawal of the Attorneys as counsel for the Liquid Mining Group and relieving the Attorneys from any and all further responsibility for representing the Liquid Mining Group in all respects and for all obligations in these bankruptcy proceedings (including without limitation under the Agreed Mediation Order (ECF No. 966) and from the upcoming mediation).

4. The Liquid Mining Group requests that all future correspondence and papers be delivered to the Liquid Mining Group to the attention of their Manager, Derek Boirun (“**Boirun**”), at 21 West End Ave., Unit 1004, New York, NY 10023 (the “**Principal Address**”) and through its registered agent Registered Agent Solutions, Inc. 838 Walker Road Suite 21-2, Dover, DE 19904 (the “**Registered Agent Address**”), and via email to Boirun at [derek@realio.fund](mailto:derek@realio.fund). Liquid Mining Group also requests that the notice address on each of their proofs of claim (Claim Nos. 100, 101, 102, 122, 124, 126, and 136) be changed to the Registered Agent Address and that the payment address on each of their proofs of claim be changed to the Principal Address.

5. The Liquid Mining Group further requests that they be relieved from all obligations under the Agreed Mediation Order. To the extent that the Liquid Mining Group’s input is appropriate, the Liquid Mining Group requests that Boirun be contacted by email (and he will make himself available via Zoom).

6. Liquid Mining Group has advised the undersigned counsel that it agrees to and requests the relief sought in this motion.

**WHEREFORE**, the Attorneys and Liquid Mining Group request the entry of an Order (in the form attached) granting this motion, authorizing and confirming the withdrawal of the Attorneys as counsel for the Liquid Mining Group (and relieving them from any and all further responsibilities

and obligations for the Liquid Mining Group), and relieving the Liquid Mining Group from all obligations under the Agreed Mediation Order, and for such other relief as is just and proper.

Dated: April 22, 2025

**DYNAMIS LLP**

*Co-Counsel for Creditors Liquid Mining Fund I, LLC, Liquid Mining Fund II, LLC, Liquid Mining Fund III, LLC*  
1111 Brickell Ave, 10<sup>th</sup> Floor  
Miami, FL 33131  
Tel: (305) 985-2959  
Email: [ceconomides@dynamisllp.com](mailto:ceconomides@dynamisllp.com)

By: /s/ Constantine Economides

Constantine Economides  
Florida Bar No.: 118177

**LESSNE HOFFMAN, PLLC**

*Co-Counsel for Creditors Liquid Mining Fund I, LLC, Liquid Mining Fund II, LLC, Liquid Mining Fund III, LLC*  
100 SE 3<sup>rd</sup> Avenue, 10th Floor  
Fort Lauderdale, FL 33394  
Tel: 954-372-5759  
Email: [mlessne@lessnehoffman.law](mailto:mlessne@lessnehoffman.law)

By: /s/ Michael D. Lessne

Michael D. Lessne  
Florida Bar No.: 73881

**CERTIFICATE OF SERVICE**

I CERTIFY that a true and correct copy of the foregoing was furnished on April 22, 2025, via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel of record or pro se parties who are authorized to receive electronically Notices of Electronic Filing in this case.

Dated: April 22, 2025

By: /s/ Constantine Economides

Constantine Economides  
Florida Bar No.: 118177

**[PROPOSED ORDER]**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

Chapter 11

Rhodium Encore LLC, *et al.*<sup>2</sup>

Case No. 24-90448 (ARP)

(Jointly Administered)

Debtors.

---

**ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL FOR LIQUID MINING  
GROUP AND FOR RELIEF FROM AGREED MEDIATION ORDER**

**THIS MATTER** came before the Court upon the *Motion to Withdraw as Counsel for Liquid Mining Group and for Relief from Agreed Mediation Order* (ECF No. \_\_) (the “**Motion**”) filed by Michael D. Lessne (“**Lessne**”) and Lessne Hoffman, PLLC (“**LH**”), Constantine Economides (“**Economides**”) and Dynamis LLP (“**Dynamis**”), and Liquid Mining Fund I, LLC (“**LMF I**”), Liquid Mining Fund II, LLC (“**LMF II**”), and Liquid Mining Fund III, LLC (“**LMF III**”) and together with LMF I and LMF II, the “**Liquid Mining Group**”), and the Court having considered the Motion and the record and good cause having been shown,

It is **ORDERED**:

1. The Motion is **GRANTED**.

---

<sup>2</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. (“REI”) (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.

2. Lessne and LH and Economides and Dynamis are authorized to withdraw as counsel for the Liquid Mining Group, and by this Order are withdrawn as counsel for the Liquid Mining Group.

3. Lessne and LH and Economides and Dynamis are relieved from any and all further responsibility for representing the Liquid Mining Group in all respects and relieved from all obligations in these bankruptcy proceedings (including without limitation under the Agreed Mediation Order (ECF No. 966) and from the upcoming mediation).

4. All future correspondence and papers shall be delivered to the Liquid Mining Group to the attention of their Manager, Derek Boirun (“**Boirun**”), at 21 West End Ave., Unit 1004, New York, NY 10023 (the “**Principal Address**”) and through its registered agent Registered Agent Solutions, Inc. 838 Walker Road Suite 21-2, Dover, DE 19904 (the “**Registered Agent Address**”), and via email to Boirun at [derek@realio.fund](mailto:derek@realio.fund).

5. The notice address on each of the Liquid Mining Group’s proofs of claim (Claim Nos. 100, 101, 102, 122, 124, 126, and 136) are hereby changed to the Registered Agent Address, and that payment address on each of the Liquid Mining Group’s proofs of claim (Claim Nos. 100, 101, 102, 122, 124, 126, and 136) are hereby changed to the Principal Address.

6. The Liquid Mining Group is relieved from all obligations under the Agreed Mediation Order. To the extent that the Liquid Mining Group’s input is appropriate, Boirun may be contacted by email (and may make himself available via Zoom).

Signed: \_\_\_\_\_

\_\_\_\_\_  
Alfredo R. Pérez  
United States Bankruptcy Judge