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

In re: 

\$ Chapter 11
CHAPTER 11
\$

RHODIUM ENCORE LLC, et al. \(^1\) \( \) \( \) Case No. 24-90448 (ARP)

§

Debtors. § (Jointly Administered)

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL NOTICES, PLEADINGS, ORDERS AND OTHER PAPERS

PLEASE TAKE NOTICE that the undersigned counsel and the law firm of Iacuone McAllister Potter PLLC hereby appear as additional counsel on behalf of Transcend Partners Legend Fund LLC; Valley High LP; GR Fairbairn Family Trust; Grant Fairbairn Revocable Trust; Nina Claire Fairbairn Revocable Trust; NCF Eagle Trust; GRF Tiger Trust; and NC Fairbairn Family Trust (collectively, the "Transcend Group") in the bankruptcy case (the "Bankruptcy Case") of the above-captioned debtors, and file this Notice of Appearance and Request for Service of All Notices, Pleadings, Orders, and Other Papers (the "Notice of Appearance"), and hereby request, pursuant to 11 U.S.C. § 1109(b) and Rules 2002, 3017, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure that all notices given or required to be given in the Bankruptcy Case, and all papers served or required to be served in the Bankruptcy Case, be served upon the undersigned counsel at the following address:

<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.



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PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, motions, applications, complaints, demands, notices of motions, notices of applications, notices of hearing, petitions, objections, answers, responses, replies, claims, schedules, statements, operating reports, plans, disclosure statements, and all other pleadings, requests or notices, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, other commercial carrier, hand delivery, facsimile, telegraph, telex, e-mail, telephone or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall not be deemed or construed as the Transcend Group's: (a) waiver of the right to have final orders in non-core matters entered only after de novo review by the United States District Court; (b) waiver of the right to trial by jury in any proceeding to which such right exists in the Bankruptcy Case or in any case, controversy, or proceeding related to the Bankruptcy Case; (c) waiver of the right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (d) waiver of the right to contest jurisdiction or appropriate venue in any related proceeding; or (e) waiver of any other rights, claims, actions, defenses, setoffs or recoupments which the Transcend Group has or may hereafter obtain, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments the Transcend Group hereby expressly reserves.

Dated: April 25, 2025 Respectfully Submitted,

## IACUONE McALLISTER POTTER PLLC

By: /s/ Chase J. Potter

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 25th day of April, 2025, a true and correct copy of this *Notice of Appearance* was served electronically through the Court's ECF system on parties registered to receive electronic in the above-captioned Bankruptcy Case.

/s/ Chase J. Potter
Chase J. Potter