

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

In re:	§	
	§	
Rhodium Encore, LLC, <i>et al.</i> , <sup>1</sup>	§	Case No. 24-90448
	§	
Debtor	§	Chapter 13

**AGREED MOTION TO WITHDRAW AS COUNSEL  
TO SHANE M. BLACKMON  
(related to Dkt. No. 22)**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE ALFREDO R. PEREZ  
UNITED STATES BANKRUPTCY JUDGE:

**COMES NOW** Tara T. LeDay (“LeDay”) and hereby files her Agreed Motion to Withdraw as Counsel to Shane M. Blackmon (“Blackmon”) (the “Motion”), and in support thereof states as follows:

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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), and Rhodium 30 MW LLC (0263). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



1. Ms. LeDay has resigned from the law firm of Chamberlain, Hrdlicka, White, Williams & Aughtry, P.C. (“Chamberlain”) and joined the law firm of Husch Blackwell LLP (“Husch Blackwell”).

2. Blackmon has indicated he does not consent to the transfer of his file to Husch Blackwell and consents to relief sought in this Motion.

3. Blackmon will appear *Pro Se* until he decides to retain other counsel. Notices may be sent to Blackmon via his email address:

Shane M. Blackmon  
Email: shane.m.bladckmon@gmail.com

4. For the foregoing reason, Tara T. LeDay hereby request the Court enter an order (i) allowing her to withdraw as counsel of record for Blackmon; (ii) directing the clerk to remove her from the master mailing list and other ECF notices related to the above-captioned case, and (iii) granting her such other equity as she may be entitled.

AGREED:

By: /s/ Shane M. Blackmon  
Shane M. Blackmon

Dated: June 3, 2025

Respectfully Submitted,

HUSCH BLACKWELL LLP

By: /s/ Tara T. LeDay  
Tara T. LeDay  
Texas Bar No. 24106701  
HUSCH BLACKWELL LLP  
111 Congress Avenue, Suite 1400  
Austin, Texas 78701  
P. 512-479-1141 / F. 512-479-1101  
Email: [Tara.LeDay@huschblackwell.com](mailto:Tara.LeDay@huschblackwell.com)

COUNSEL FOR SHANE M. BLACKMON

**CERTIFICATE OF SERVICE**

This will certify that a true and correct copy of the foregoing pleading is being served *via* this Court's ECF notification system to all parties registered to receive such notice on June 3, 2025.

/s/ Tara T. LeDay  
Tara T. LeDay

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

In re:	§	
	§	
Rhodium Encores, LLC, <i>et al.</i> , <sup>2</sup>	§	Case No. 24-90448
	§	
Debtor	§	Chapter 13

**AGREED ORDER GRANTING MOTION TO WITHDRAW  
AS COUNSEL TO SHANE M. BLACKMON  
(related to Dkt. Nos. 22 and \_\_)**

Upon consideration of the *Agreed Motion to Withdraw as Counsel to Shane M. Blackmon* filed by Tara T. LeDay on June 3, 2025 (the “Motion”), the response and objections, if any, the arguments of counsel, if any, all documents, pleadings, and motions on file, and the agreement by Shane M. Blackmon, the Court hereby GRANTS the Motion;

THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED that Tara T. LeDay is hereby withdrawn as counsel of record for Shane M. Blackmon, in the above referenced matter.

IT IS FURTHER ORDERED that all future notices and papers should be sent directly to Mr. Blackmon at his Email address: shane.m.blackmon@gmail.com.

SIGNED \_\_\_\_\_, 2025.

\_\_\_\_\_  
ALFREDO R. PEREZ  
UNITED STATES BANKRUPTCY JUDGE

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<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), and Rhodium 30 MW LLC (0263). The mailing and service address of the Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.

**AGREED:**

By: /s/ Shane M. Blackmon

Shane M. Blackmon

Orde submitted by:

By: /s/ Tara T. LeDay

Tara T. LeDay

Texas Bar No. 24106701

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COUNSEL FOR SHANE M. BLACKMON