

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

In re:	§	Case No. 24-90448 (arp)
	§	
Rhodium Encore LLC, et al.,¹	§	Chapter 11
	§	
Debtor.	§	(Jointly Administered)

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Bankruptcy Local Rule 9013:

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 Michael K. Riordan attorney of record through his former position at Chamberlain Hrdlicka White Williams & Aughtry, P.C. (“**Chamberlain**”), bankruptcy co-counsel for Shane E. Blackmon (“**Creditor**”), files this Motion to withdraw as Counsel for Creditor. Pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure, Michael K. Riordan

¹ 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.



respectfully moves to withdraw as counsel for Creditor Shane E. Blackmon in the above-captioned bankruptcy case. In support of this Motion, the undersigned states as follows:

1. On August 24, 2024, (“**Petition Date**”), the Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (“**Bankruptcy Code**”).

2. Michael K. Riordan previously appeared as counsel for Shane E. Blackmon while employed at Chamberlain Hrdlicka.

3. Effective March 15, 2025, Michael K. Riordan is no longer affiliated with Chamberlain Hrdlicka and is now employed at Bradley Arant Boult Cummings LLP (“**Bradley**”).

4. The Creditor has not executed an engagement letter with Bradley, and as such, the undersigned cannot continue representation.

5. This withdrawal will not unduly prejudice the Creditor. The Creditor has been informed of this motion and does not oppose.

6. No trial or hearing is currently scheduled that would be affected by this withdrawal.

WHEREFORE, Michael K. Riordan respectfully requests that the Court enter an order permitting Mr. Riordan to withdraw as counsel of record for Shane E. Blackmon. in this matter, and for such other and further relief as the Court deems just and proper.

Dated: June 13, 2025

Respectfully submitted,

BRADLEY ARANT BOULT CUMMINGS LLP

/s/ Michael K. Riordan

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CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2025, a true and correct copy of the foregoing Motion to Withdraw was served via on the Court's Electronic Notification System on all parties entitled to such notice, including the US Trustee and a copy was forwarded to Shane E. Blackmon via email at Shane.m.blackmon@gmail.com.

/s/ Michael K. Riordan

Michael K. Riordan

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ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL

The Court has considered the Motion to Withdraw as Counsel filed by Michael K. Riordan. The Court finds that the motion is well taken and should be GRANTED.

IT IS THEREFORE ORDERED that:

1. Michael K. Riordan and Chamberlain, Hrdlicka, White, Williams & Aughtry, PC are withdrawn as counsel of record for Creditor Shane E. Blackmon, in the above-captioned case.
2. The Clerk of the Court is directed to terminate ECF notifications to Michael K. Riordan in this case.

Alfredo R. Perez
United States Bankruptcy Judge