

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

In re:

RHODIUM ENCORE LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-90448 (ARP)

(Jointly Administered)

**NOTICE OF SUBSTITUTION OF COUNSEL
FOR CREDITOR PROOF CAPITAL SPECIAL SITUATIONS FUND**

PLEASE TAKE NOTICE AND WITHDRAW THE APPEARANCE of Carl N. Kunz, III, Esq., Eric J. Monzo, Esq., and Christopher M. Donnelly, Esq. of Morris James LLP, as counsel for Proof Capital Special Situations Fund (“Proof Situations”).

PLEASE TAKE FURTHER NOTICE AND ENTER THE APPEARANCE of Ian R. Phillips, Esq., Justin R. Alberto, Esq., Stacy L. Newman, Esq., and Bryant P. Churbuck, Esq. of Cole Schotz P.C., as counsel for Proof Situations. Copies of all notices and pleadings given or filed in this case be given and served upon them at the following addresses:

COLE SCHOTZ P.C.

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¹ 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), Jordan HPC Sub LLC (0463), Rhodium 2.0 Sub LLC (5319), Rhodium 10MW Sub LLC (3827), Rhodium 30MW Sub LLC (4386), Rhodium Encore Sub LLC (1064), Rhodium Enterprises, Inc. (6290), Rhodium Industries LLC (4771), Rhodium Ready Ventures LLC (8618), Rhodium Renewables LLC (0748), Air HPC LLC (0387), Rhodium Renewables Sub LLC (9511), Rhodium Shared Services LLC (5868), and Rhodium Technologies LLC (3973). The mailing and service address of Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



PLEASE TAKE FURTHER NOTICE that Proof Situations consents to this substitution and hereby substitutes the law firm of Cole Schotz P.C. as its counsel.

Dated: June 18, 2025

COLE SCHOTZ P.C.

/s/ Ian R. Phillips

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-and-

Justin R. Alberto, Esq. (*pro hac vice* forthcoming)
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Substituting Counsel for Proof Capital Special Situations Fund

Dated: June 18, 2025

MORRIS JAMES LLP

/s/ Carl N. Kunz, III

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Withdrawing Counsel to Proof Capital Special Situations Fund

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2025, a true and correct copy of the foregoing *Notice of Substitution of Counsel for Creditor Proof Capital Special Situations Fund* was filed with the Court and served via the Court's CM/ECF notification system upon all parties registered to receive such electronic notices in this case, and on all beneficiaries under the Plan who otherwise stand to recover under the terms of the Settlement Agreement and Plan.

/s/ Carl N. Kunz, III

Carl N. Kunz, III, Esq.