

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

In re:	§	Chapter 11
	§	
RHODIUM ENCORE LLC, <i>et al.</i> , ¹	§	Case No. 24-90448 (ARP)
	§	
Debtors.	§	
	§	(Jointly Administered)
	§	

**NOTICE OF RECEIPT OF PAYMENT AND
WITHDRAWAL OF LEHOTSKY KELLER COHN LLP’S MOTION FOR ORDER
DIRECTING PAYMENT OF FEES AND EXPENSES**

[Relates to ECF Nos. 2198 & 2221]

PLEASE TAKE NOTICE that on December 24, 2025, the Court entered its order [ECF No. 2198] (the “**Order**”) approving, and directing payment regarding *Lehotsky Keller Cohn LLP’s Second and Final Application for Payment of Compensation and Reimbursement of Expenses for the Period of August 28, 2024 through June 30, 2025* [ECF Nos. 1560-1561].

PLEASE TAKE FURTHER NOTICE that on January 12, 2026, Lehotsky Keller Cohn LLP (“**LKC**”) filed a *Motion for Order Directing Payment of Fees and Expenses* [ECF No. 2221] (the “**Motion**”) because the Debtors had flouted the Court’s order by failing to pay LKC—even after LKC raised the issue with the Debtors and the Special Committee. Neither the Debtors nor the Special Committee responded to LKC’s communications regarding payment. They still have not done so.

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), Rhodium Enterprises, Inc. (6290), Rhodium Technologies 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 Debtors in these chapter 11 cases is 2617 Bissonnet Street, Suite 234, Houston, TX 77005.



PLEASE TAKE FURTHER NOTICE that, in the Motion, LKC sought interest and its fees and costs for filing the Motion.

PLEASE TAKE FURTHER NOTICE that on January 14, 2026, the Debtors finally paid the amount required by the Order on December 24, 2025, but not interest or the fees and costs requested in the Motion.

PLEASE TAKE FURTHER NOTICE that LKC hereby withdraws the Motion without prejudice to seeking interest and the fees and costs requested in the Motion. All LKC's rights are reserved.

Dated: January 15, 2026
Houston, Texas

Respectfully submitted,

/s/ Joshua W. Wolfshohl _____

Joshua W. Wolfshohl (TX Bar No. 24038592)

Michael B. Dearman (TX Bar No. 24116270)

PORTER HEDGES LLP

1000 Main Street, 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Facsimile: (713) 226-6248

jwolfshohl@porterhedges.com

mdearman@porterhedges.com

Counsel to Lehotsky Keller Cohn LLP

CERTIFICATE OF SERVICE

I, Joshua W. Wolfshohl, certify that on the 15th day of January 2026, a copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on all parties registered to receive ECF notice in the above-captioned case.

/s/ Joshua W. Wolfshohl
Joshua W. Wolfshohl