

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

In re:

RHODIUM ENCORE LLC, *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-90448 (ARP)

Jointly Administered

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby appear in the above-captioned chapter 11 cases as counsel to B. Riley Securities, Inc. and, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), and rule 9013-1 of the Bankruptcy Local Rules for the United States Bankruptcy Court for the Southern District of Texas, and request that all notices given or required to be given and all papers served in these cases be delivered to and served upon the party identified below at the following address:

Daniel F.X. Geoghan, Esq.  
COLE SCHOTZ P.C.  
901 Main Street, Suite 4120  
Dallas, TX 75202  
Telephone: (469) 557-9390  
Facsimile: (469) 533-1587  
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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the above

<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.



referenced Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, hand-delivery, telephone, facsimile transmission or otherwise, in these cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers (the “Notice”) nor any later appearance, pleading, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding related to, or triable in, these cases or any cases, controversy or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other rights, claims, actions, defenses, setoffs or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: March 2, 2026  
Dallas, Texas

Respectfully submitted,

/s/ Daniel F.X. Geoghan

Daniel F.X. Geoghan (Texas Bar No. 24126280)

**COLE SCHOTZ P.C.**

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*Counsel to B. Riley Securities, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on March 2, 2026, I caused a copy of the foregoing document to be served by electronic transmission to all registered ECF users appearing in these cases.

*/s/ Daniel F.X. Geoghan*

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Daniel F.X. Geoghan