

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

In re: RHODIUM ENCORE LLC, <i>et al.</i> , ¹ Debtors.	§ § § § § § §	Chapter 11 Case No. 24-90448 (ARP) (Joint Administration Pending)
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NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE

On August 24, 2024 (the “Petition Date”), the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed voluntary petitions for relief under title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of Texas. The undersigned proposed counsel believes that these chapter 11 cases qualify as complex chapter 11 cases because:

- The Debtors have total debt of more than \$10 million;
- There are more than 50 parties-in-interest in this case;
- Claims against the Debtors are publicly traded;
- Other (Substantial explanation is required. Attach additional sheets if necessary.)

Conclusion

The Debtors request entry of the Order granting the relief requested herein and granting such other relief as the Court deems appropriate under the circumstances.

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), 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.



Respectfully submitted this 24th day of August, 2024.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Patricia B. Tomasco

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*Proposed Counsel to the Debtors and
Debtors-In-Possession*

Certificate of Service

I hereby certify that on the 24th day of August, 2024, a true and correct copy of the Notice of Designation as Complex Chapter 11 Bankruptcy Case was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Patricia B. Tomasco _____

Patricia B. Tomasco

**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.	§	
	§	(Joint Administration Pending)
	§	

ORDER GRANTING COMPLEX CHAPTER 11 BANKRUPTCY CASE TREATMENT
(Relates to ECF No. ____)

These jointly-administered cases were filed on August 24, 2024. A Notice of Designation as Complex Chapter 11 Bankruptcy Case was filed. Based on its review of the initial pleadings, the Court concludes that the complex chapter 11 case designation is appropriate. Accordingly, the Court orders:

1. The Procedures for Complex Chapter 11 Cases in the Southern District of Texas apply to these cases. The procedures are posted on the Court’s website. Compliance with the procedures is required.
2. The Debtors must give notice of this Order to all parties-in-interest within seven days. If a party-in-interest objects to the provisions of this Order, that party may file an appropriate motion within 14 days after service of the Order.
3. The Bankruptcy Local Rules apply to this case, subject to the following modifications:
 - a. Bankruptcy Local Rule 1001-1(b) does not apply.

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- b. Local District Court Civil Rule 83.1 applies.
- c. Appendix A to the Local Rules of the District Court applies.
- d. If a conflict exists between the Bankruptcy Local Rules and the Procedures for Complex Chapter 11 Cases in the Southern District of Texas, the Procedures for Complex Chapter 11 Cases in the Southern District of Texas govern.

Dated: _____, 2024

UNITED STATES BANKRUPTCY JUDGE