

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., <sup>1</sup>	)	Case No. 19-12239 (CSS)
Debtor.	)	

Hearing Date: October 18, 2019 at 10:00 a.m. (ET)

**NOTICE OF HEARING ON FIRST DAY MOTIONS**

PLEASE TAKE NOTICE that on October 16, 2019 (the "Petition Date"), the above-captioned debtor and debtor in possession (collectively, 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 (the "Bankruptcy Code"), with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtor is continuing to operate its business and manage its affairs as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that together with the chapter 11 petition, the Debtor also filed the following applications and motions set forth below (collectively, the "First Day Motions"). A hearing to consider the First Day Motions (the "First Day Hearing") will be held on **October 18, 2019 at 10:00 a.m. (Eastern Time)**, before the Honorable Christopher S. Sontchi at the United States Bankruptcy Court for the District of Delaware (the "Court"), located at 824 North Market Street, 5th Floor, Courtroom No. 6, Wilmington, Delaware 19801.

<sup>1</sup> The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.



**First Day Administrative and Procedural Motions**

1. **Claims Agent Application.** Application for an Order Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent for the Debtor Pursuant to 28 U.S.C. § 156(C), 11 U.S.C. § 105(A) and Local Rule 2002-1(F). [Docket No. 7, filed on October 16, 2019]
2. **Seal Motion.** Motion of Debtor for Entry of Interim and Final Orders Authorizing Debtor to File Under Seal Portions of its Creditor Matrix Containing Employee Address Information. [Docket No. 8, filed on October 16, 2019]

**First Day Motions Pertaining to Business Operations**

3. **Wages Motion.** Motion of Debtor for Entry of Order (I) Authorizing the Debtor to (A) Pay and Honor Prepetition Compensation, Reimbursable Business Expenses, and Employee Benefit Obligations, and (B) Maintain and Continue Certain Compensation and Benefit Programs Postpetition; and (II) Granting Related Relief. [Docket No. 2, filed on October 16, 2019]
4. **Cash Management Motion.** Motion of Debtor for Entry of Interim and Final Orders Authorizing (A) Continuance of Existing Cash Management System and Brokerage Relationships, (B) Continued Use of the Prime Account, (C) Limited Waiver of Section 345(b) Deposit and Investment Requirements, and (D) Granting Related Relief. [Docket No. 5, filed on October 16, 2019]
5. **Critical Vendors Motion.** Motion of Debtor for Entry of Interim and Final Orders (A) Authorizing Debtor to Pay Prepetition Claims of Critical Vendors and (B) Granting Related Relief. [Docket No. 3, filed on October 16, 2019]

**First Day Motion Pertaining to Financing**

6. **Cash Collateral Motion.** Motion of Debtor for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, (B) Providing Adequate Protection, (C) Authorizing the Liquidation of Securities, (D) Modifying the Automatic Stay, and (E) Scheduling a Final Hearing. [Docket No. 6, filed on October 16, 2019]

**PLEASE TAKE FURTHER NOTICE** that copies of the First Day Motions can be obtained for a fee through the Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov), referencing Case No. 19-12239 (CSS) or by request to the undersigned counsel.

**PLEASE TAKE FURTHER NOTICE** that any and all objections to the First Day Motions may be made at the First Day Hearing.

Dated: October 17, 2019

PACHULSKI STANG ZIEHL & JONES LLP

*/s/ James E. O'Neill*

Richard M. Pachulski (CA Bar No. 62337)  
Jeffrey N. Pomerantz (CA Bar No.143717)  
Ira D. Kharasch (CA Bar No. 109084)  
Maxim B. Litvak (CA Bar No. 215852)  
James E. O'Neill (DE Bar No. 4042)  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, DE 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
E-mail: rpachulski@pszjlaw.com  
jpomerantz@pszjlaw.com  
ikharasch@pszjlaw.com  
mlitvak@pszjlaw.com  
joneill@pszjlaw.com

Counsel for the Debtors and Debtors-in-Possession