

COMES NOW Highland Capital Management, L.P. (the “Debtor”) filing this *Emergency Motion to Continue Hearing on Disclosure Statement for the First Amended Plan of Reorganization of Highland Capital Management, L.P.* (the “Motion”). In support of the Motion, the Debtor would respectfully show the Court as follows:

1. On October 16, 2019 (the “Petition Date”), the Debtor commenced a voluntary case under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Case”).

2. The Bankruptcy Case was transferred to this Court on December 4, 2019.

3. On September 21, 2020, the Debtor filed (a) the *First Amended Plan of Reorganization of Highland Capital Management, L.P.* dated September 21, 2020 [Docket No. 1079] (including all exhibits thereto and as amended, modified or supplemented from time to time, the “Plan”)²; and (b) the *Disclosure Statement for the First Amended Plan of Reorganization of Highland Capital Management, L.P.* [Docket No. 1080] (as it may be amended from time to time, the “Disclosure Statement”).

4. The deadline for any party to file an objection regarding the approval of the Disclosure Statement was scheduled as October 19, 2020 at 5:00 p.m. (prevailing Central Time) (the “Objection Deadline”).

5. A hearing (the “Disclosure Statement Hearing”) to consider approval of the Disclosure Statement was originally scheduled to commence on October 22, 2020 at 9:30 a.m. (prevailing Central Time) (the “Original Hearing Date”).

² Unless otherwise defined herein, all capitalized terms shall have the respective meanings ascribed to them in the Plan.

6. Due to the number of objections to the Disclosure Statement filed by parties-in-interest on or near the Objection Deadline, the Debtor is seeking to continue the Disclosure Statement Hearing from the Original Hearing Date to **Tuesday, October 27, 2020 at 10:30 a.m. (prevailing Central Time)** (the "New Hearing Date"). Debtor's counsel has conferred with counsel for the Official Committee of Unsecured Creditors (the "Committee"), and the Committee is unopposed to rescheduling the Disclosure Statement for the New Hearing Date.

7. This Motion is being filed not for the purposes of delay, but solely to facilitate the parties' negotiation of certain issues related to the Disclosure Statement and the objections thereto.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that the Court grant this Motion, continue the Disclosure Statement Hearing until October 27, 2020 at 10:30 a.m. (prevailing Central Time), and grant the Debtor such other and further relief as is just and equitable.

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Dated: October 21, 2020.

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