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ATTORNEYS FOR CLO HOLDCO, LTD.

**THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: HIGHLAND CAPITAL MANAGEMENT, L.P., DEBTOR.	§ § § § § § § §	CHAPTER 11 CASE No. 19-34054-SGJ
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WITNESS AND EXHIBIT LIST

COMES NOW, CLO Holdco, Ltd. ("**CLO**"), a creditor and party-in-interest in this case, and files this Witness and Exhibit List for the Debtor's plan confirmation hearing scheduled on **Wednesday, January 26, 2021, at 9:30 a.m. CST** (the "**Hearing**") in the above-captioned chapter 11 bankruptcy case before the Honorable Stacey G. Jernigan.

WITNESSES

CLO may call any of the following witnesses at the Hearing, in person or by proffer:

1. Grant J. Scott, CLO Holdco, Ltd.
2. Any witness called or designated by any other party.
3. Any impeachment or rebuttal witnesses.



EXHIBITS

CLO offers into evidence one or more of the following exhibits at the Hearing:

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
1.	Notice of (I) Executory Contracts and Unexpired Leases to be Assumed by the Debtor Pursuant to the Fifth Amended Plan, (II) Cure Amounts, if any, and (III) Related Procedures in Connection Therewith [Dkt. No. 1648] filed December 30, 2020.			
2.	Second Notice of (I) Executory Contracts and Unexpired Leases to be Assumed by the Debtor Pursuant to the Fifth Amended Plan, (II) Cure Amounts, if any, and (III) Related Procedures in Connection Therewith [Dkt. No. 1719] filed January 11, 2021			
3.	Aberdeen Loan Funding, Ltd. Servicing Agreement [CONFIDENTIAL]			
4.	Brentwood CLO Ltd. Servicing Agreement [CONFIDENTIAL]			
5.	Grayson CLO Ltd. Servicing Agreement and Amendment to Servicing Agreement [CONFIDENTIAL]			
6.	Liberty CLO, Ltd. Portfolio Management Agreement [CONFIDENTIAL]			
7.	Red River CLO Ltd. Servicing Agreement and Amendment to Servicing Agreement [CONFIDENTIAL]			
8.	Rockwall CDO Ltd. Servicing Agreement [CONFIDENTIAL]			
9.	Valhalla CLO, Ltd. Reference Portfolio Management Agreement [CONFIDENTIAL]			
10.	Westchester CLO, Ltd. Servicing Agreement [CONFIDENTIAL]			

EXHIBIT	DESCRIPTION OF EXHIBIT	OFFERED	OBJECTION	ADMITTED
11.	Debtor Prepared Summary of CLO Holdco, Ltd.'s Interest in Debtor-Managed CLO Funds [CONFIDENTIAL]			
12.	Letter from Defendants' attorneys to Debtor's attorneys dated December 22, 2020			
13.	Letter from Defendants' attorneys to Debtor's attorneys dated December 23, 2020			
14.	Letter from Debtor's attorneys to Defendants' attorneys in response to December 22, 2020 Letter			
15.	Letter from Debtor's attorneys to Defendants' attorneys in response to December 23, 2020 Letter			
16.	Letter from Defendants' attorneys to Debtor's attorneys dated December 28, 2020 Clarifying Defendants' positions			
17.	Deposition Transcript; Deposition of James Seery Dated January 20, 2020, page 107 ¶ 21 through page 110 ¶ 21			

CLO reserves the right to: (i) use any exhibits presented by any other party; (ii) use any exhibits not listed herein for impeachment and rebuttal purposes; (iii) limit any exhibits to redacted form; and (iv) supplement and/or amend this Witness and Exhibit List at any time prior to the Hearing.

DATED: January 22, 2021

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

By: /s/John J. Kane

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ATTORNEYS FOR CLO HOLDCO, LTD.

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, a true and correct copy of the foregoing *Witness and Exhibit List* was served via the Court's electronic case filing (ECF) system upon all parties receiving such service in this bankruptcy case. Copies of CLO's proposed Exhibits were provided to the Court, counsel for the Official Committee of Unsecured Creditors, counsel for the Debtor, and counsel for the Office of the United States Trustee in accordance with the terms and conditions of the Agreed Protective Order entered by the Court at Dkt. No. 382.

/s/ John J. Kane
John J. Kane