

STINSON LLP

Deborah Deitsch-Perez
Michael P. Aigen
2200 Ross Avenue, Suite 2900
Dallas, Texas 75201
Telephone: (214) 560-2201
Facsimile: (214) 560-2203
Email: deborah.deitschperez@stinson.com
Email: michael.aigen@stinson.com

*Counsel for Highland CLO Management, Ltd.
and James Dondero*

**IN 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)

**STIPULATION TO EXTEND HIGHLAND CLO MANAGEMENT, LTD.'S AND JAMES
DONDERO'S RESPONSE DEADLINE WITH RESPECT TO
HIGHLAND CAPITAL MANAGEMENT, L.P.'S MOTION FOR
(A) A BAD FAITH FINDING AND (B) AN AWARD OF ATTORNEYS' FEES
AGAINST HIGHLAND CLO MANAGEMENT, LTD. AND JAMES DONDERO IN
CONNECTION WITH HCLOM CLAIMS 3.65 AND 3.66**

This stipulation (the "Stipulation") is made and entered into in the above-captioned bankruptcy proceeding by and among Highland CLO Management, LTD. ("HCLOM"), James Dondero ("Dondero"), and Highland Capital Management, L.P. ("Highland"), the reorganized debtor in the above-referenced bankruptcy (together, the "Parties"), by and through their respective undersigned counsel and subject to Court approval. The Parties respectfully state and stipulate as follows:



IT IS HEREBY JOINTLY STIPULATED AND AGREED as follows:

1. HCLOM's and Dondero's deadline to serve and file a substantive objection to *Highland Capital Management, L.P.'s Motion for (A) a Bad Faith Finding and (B) an Award of Attorneys' Fees Against Highland CLO Management, Ltd. and James Dondero in Connection with HCLOM Claims 3.65 and 3.66* [Dkt 4176] (the "Motion") is extended from December 12, 2024, to December 16, 2024.

2. If the Court requests further briefing on the Motion following the December 18, 2024 hearing, the Parties shall simultaneously file supplemental briefs by 5:00 p.m. Central Time on January 17, 2025 (no further briefing shall be permitted without leave of court upon a showing of good cause).

3. This Stipulation may be executed in counterparts. A facsimile, electronic, or photocopy of this Stipulation and the signatures hereto shall have the same effect and may be accepted with the same authority as if it were an original.

Dated: December 9, 2024

CONSENTED AND AGREED TO BY:

/s/ Deborah Deitsch-Perez

Deborah Deitsch-Perez
State Bar No. 24036072
Michael P. Aigen
State Bar No. 24012196
STINSON LLP
2200 Ross Avenue, Suite 2900
Dallas, Texas 75201
(214) 560-2201 telephone
(214) 560-2203 facsimile
Email: deborah.deitschperez@stinson.com
Email: michael.aigen@stinson.com

*Counsel for Highland CLO Management, Ltd. and
James Dondero*

/s/ John A. Morris

PACHULSKI STANG ZIEHL & JONES
LLP
Jeffrey N. Pomerantz (CA Bar No. 143717)
John A. Morris (NY Bar No. 2405397)
Gregory V. Demo (NY Bar No. 5371992)
Hayley R. Winograd (NY Bar No. 5612569)
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Telephone: (310) 277-6910
Facsimile: (310) 201-0760
E-mail: jpomerantz@pszjlaw.com
jmorris@pszjlaw.com
gdemo@pszjlaw.com
hwinograd@pszjlaw.com

- and -

HAYWARD PLLC

/s/ Zachery Z. Annable

Melissa S. Hayward
Texas Bar No. 24044908
MHayward@HaywardFirm.com
Zachery Z. Annable
Texas Bar No. 24053075
ZAnnable@HaywardFirm.com
10501 N. Central Expy, Ste. 106
Dallas, Texas 75231
Telephone: (972) 755-7100
Facsimile: (972) 755-7110

*Counsel for Highland Capital Management,
L.P.*

**IN 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)

**ORDER APPROVING STIPULATION TO EXTEND HIGHLAND CLO
MANAGEMENT, LTD.'S AND JAMES DONDERO'S RESPONSE DEADLINE WITH
RESPECT TO HIGHLAND CAPITAL MANAGEMENT, L.P.'S MOTION FOR
(A) A BAD FAITH FINDING AND (B) AN AWARD OF ATTORNEYS' FEES
AGAINST HIGHLAND CLO MANAGEMENT, LTD. AND JAMES DONDERO IN
CONNECTION WITH HCLOM CLAIMS 3.65 AND 3.66**

Upon consideration of the stipulation (the "Stipulation") to extend Highland CLO Management, Ltd.'s ("HCLOM") and James Dondero's ("Dondero") deadline to respond to *Highland Capital Management, L.P.'s Motion for (A) a Bad Faith Finding and (B) an Award of*

Attorneys' Fees Against Highland CLO Management, Ltd. and James Dondero in Connection with HCLOM Claims 3.65 and 3.66 [Dkt 4176] (the "Motion") by and between HCLOM, Dondero, and Highland Capital Management, L.P. ("Highland"), the reorganized debtor in the above-referenced bankruptcy (together, the "Parties"), it is **HEREBY ORDERED THAT:**

1. The deadline for HCLOM and Dondero to serve and file a substantive response or objection to the Motion is extended from December 12, 2024, to December 16, 2024.
2. If the Court requests further briefing on the Motion following the December 18, 2024 hearing, the Parties shall simultaneously file supplemental briefs by 5:00 p.m. Central Time on January 17, 2025 (no further briefing shall be permitted without leave of court upon a showing of good cause).
3. The Court shall retain jurisdiction over all disputes arising out of or otherwise concerning the interpretation and enforcement of this Stipulation.

###END OF ORDER###

CONSENTED AND AGREED TO BY:

/s/ Deborah Deitsch-Perez

Deborah Deitsch-Perez
State Bar No. 24036072
Michael P. Aigen
State Bar No. 24012196
STINSON LLP
2200 Ross Avenue, Suite 2900
Dallas, Texas 75201
(214) 560-2201 telephone
(214) 560-2203 facsimile
Email: deborah.deitschperez@stinson.com
Email: michael.aigen@stinson.com

*Counsel for Highland CLO Management, Ltd. and
James Dondero*

/s/ John A. Morris

PACHULSKI STANG ZIEHL & JONES
LLP
Jeffrey N. Pomerantz (CA Bar No. 143717)
John A. Morris (NY Bar No. 2405397)
Gregory V. Demo (NY Bar No. 5371992)
Hayley R. Winograd (NY Bar No. 5612569)
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Telephone: (310) 277-6910
Facsimile: (310) 201-0760
E-mail: jpomerantz@pszjlaw.com
jmorris@pszjlaw.com
gdemo@pszjlaw.com
hwinograd@pszjlaw.com

- and -

HAYWARD PLLC

/s/ Zachery Z. Annable

Melissa S. Hayward
Texas Bar No. 24044908
MHayward@HaywardFirm.com
Zachery Z. Annable
Texas Bar No. 24053075
ZAnnable@HaywardFirm.com
10501 N. Central Expy, Ste. 106
Dallas, Texas 75231
Telephone: (972) 755-7100
Facsimile: (972) 755-7110

*Counsel for Highland Capital Management,
L.P.*