

PACHULSKI STANG ZIEHL & JONES LLP

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John A. Morris (NY Bar No. 2405397) (*admitted pro hac vice*)
Gregory V. Demo (NY Bar No. 5371992) (*admitted pro hac vice*)
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HAYWARD PLLC

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Counsel for Highland Capital Management, L.P.

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

-----)	
In re:)	Chapter 11
)	
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹)	Case No. 19-34054-sgj11
)	
Reorganized Debtor.)	
-----)	

¹ Highland’s last four digits of its taxpayer identification number are (8357). The headquarters and service address for Highland is 100 Crescent Court, Suite 1850, Dallas, TX 75201.



**NOTICE OF ATTORNEYS' FEES CALCULATION
AND BACKUP DOCUMENTATION [SEE DOCKET NO. 4176]**

PLEASE TAKE NOTICE that Highland Capital Management, L.P. ("Highland"), the reorganized debtor in the above-captioned chapter 11 case (the "Bankruptcy Case"), hereby files this *Notice of Attorney's Fees Calculation and Backup Documentation [See Docket No. 4176]* (the "Notice") in support of its *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 [Docket No. 4176]* (the "Motion"). Attached as **Exhibit 1** is the declaration of John A. Morris in support of the Motion (the "Declaration") and backup documentation supporting the calculation of attorneys' fees.

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Dated: December 13, 2024

PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (CA Bar No. 143717)
John A. Morris (NY Bar No. 2405397)
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-and-

HAYWARD PLLC

/s/ Zachery Z. Annable

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Counsel for Highland Capital Management, L.P.

EXHIBIT 1

DECLARATION OF JOHN A. MORRIS IN SUPPORT OF 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

I, John A. Morris, pursuant to 28 U.S.C. § 1746, under penalty of perjury, declare as follows:

1. I am a partner in the law firm Pachulski, Stang, Ziehl & Jones LLP (the "Firm"), counsel to Highland.¹ I submit this Declaration in support of the Motion. I have overseen my Firm's representation of Highland in all aspects of the litigation concerning the HCLOM Claim. This Declaration is based on my personal knowledge and review of the documents listed below.

A. Attorneys' Fees Charged by the Firm in Connection with Highland's Objection to the HCLOM Claim and the Preparation of the Motion

2. I and others working at my direction have reviewed invoices related to the attorneys' fees and expenses charged to Highland in connection with Highland's objection to the HCLOM Claim and the preparation of the Motion and calculated the amount of attorneys' fees and expenses incurred in connection therewith.

3. In the ordinary course of business, timekeepers (including attorneys and legal assistants) at my Firm record billable time in increments of one-tenth of an hour. Timekeepers are also required to classify their work by task codes and/or matter numbers to differentiate between individual tasks conducted for the same client.

¹ Capitalized terms not defined in this Declaration shall have the meanings ascribed to them in the *Notice of Attorney's Fees Calculation and Backup Documentation* [See Docket No. 4176] (the "Notice") or the *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* [Docket No. 4176] (the "Motion").

4. For the period April 3, 2023 through November 30, 2024,² the Firm's timekeepers generally recorded their time entries relating to the HCLOM Claim and Motion under matter number ".003" and task code "BL" (short for "Bankruptcy Litigation"), "OIC" (short for "Other Insider Claims"), or "CO" (short for "Claim Objection").³ Attached as **Exhibit A** are the Firm's invoices for the period April 3, 2023 through November 30, 2024 that reflect all of the Firm's time billed to the litigation of the HCLOM Claim (collectively, the "PSZJ Invoices"). We have redacted all entries that we concluded were unrelated to services rendered in connection with the HCLOM Claim or Motion.

5. Subject to the foregoing, for the period April 3, 2023 through November 30, 2024, the attorneys' fees billed by the Firm's timekeepers with respect to the HCLOM Claim are in the aggregate amount of \$599,912.50 (the "Fees"). With one exception, all Fees have been charged to, and paid by, Highland.⁴

B. Third-Party Expenses Incurred in Connection with the HCLOM Claim

6. Highland took or defended five depositions in connection with the HCLOM Claim (the "Depositions"), two of which took place in Dallas, Texas (the "In-Person Depositions") and three of which were taken remotely.

7. Attached as **Exhibit B** are invoices rendered by Veritext Legal Solutions, Everest Court Reporting, and Remote Legal for court reporting services provided in connection with the

² The time period covering Highland's request for an award of attorneys' fees begins on April 3, 2023, the date HCLOM Ltd. filed its Response. See Motion ¶ 14. For the avoidance of doubt, Highland does not seek to recover any costs or expenses concerning its initial investigation of the HCLOM Claim or the preparation of the Objection, because HCLOM Ltd. had not yet taken a position in relation to the Objection.

³ Certain time entries for work related to the HCLOM Claim were inadvertently billed to other task codes. See September and November 2024 invoices (containing task codes "CLO," "HCREBF," "DAFC," or "RECU").

⁴ The exception pertains to the fees incurred in the month of November 2024; the Firm has prepared the invoice but it has not been reviewed or paid by Highland. This declaration will be updated prior to the Hearing if there is a change in the amounts charged or expected to be paid by Highland.

Depositions (the “Deposition Expenses”). The Deposition Expenses incurred by the Firm are in the aggregate amount of \$9,545.90.

8. I traveled from New York to Dallas for the In-Person Depositions. Attached as **Exhibit C** are invoices showing that the amount the Firm incurred in connection with this travel (the “Travel Expenses,” and together with the Deposition Expenses, the “Expenses”) are in the aggregate amount of \$1,261.96.

9. For the period April 1, 2024 through November 30, 2024, the Expenses incurred by the Firm and charged to, and paid by, Highland with respect to the HCLOM Claim are in the total aggregate amount of \$10,807.86.⁵

C. **Summary of Fees and Expenses Incurred by Highland in Connection with the HCLOM Claim**

10. Attached as **Exhibit D** is a chart showing that the aggregate amount of Fees and Expenses charged to, and paid by, Highland in connection with the HCLOM Claim is \$610,720.36.⁶

11. I declare under penalty of perjury that the forgoing is true and correct.

Dated: December 13, 2024.

/s/ John A. Morris
John A. Morris

⁵ See *supra* n. 5.

⁶ See *supra* n. 5.

EXHIBIT A

PSZJ INVOICES



PACHULSKI
STANG
ZIEHL &
JONES

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

Highland Capital Management LP
James P. Seery, Jr.
Highland Capital Management LP
100 Crescent Court, Suite 1850
Dallas, TX 75201

April 30, 2023
Invoice 132435
Client 36027.00003

RE: Post-Effective Date

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2023

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 45
 Invoice 132435
 April 30, 2023

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Other Insider Claims						
04/03/2023	JMF	OIC	Review responses to HCLOM claims.	0.40	1,275.00	\$510.00
			[REDACTED]			
			[REDACTED]			
04/08/2023	JAM	OIC	Preliminary review/response to Objection to HCLOM claim (0.3); tel c. w/ J. Pomerantz re: next steps on HCLOM claim objection (0.1); tel c. w/ J. Seery re: next steps on HCLOM objection (0.2).	0.60	1,550.00	\$930.00
04/09/2023	JAM	OIC	E-mail to M. Aigen, J. Pomerantz, G. Demo re: stay vs. discovery concerning HCLOM objection (0.4), e-mails w/ J. Seery, J. [REDACTED], G. Demo re: email to Aigen (0.1).	0.50	1,550.00	\$775.00
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
04/10/2023	IDK	OIC	E-mails with attorneys re our draft reply re stay of HCLOM objection, including review of same, as well as responses from HCLOM counsel.	0.30	1,645.00	\$493.50
04/10/2023	GVD	OIC	Review HCLOM responses to claim objection (0.4); review draft reply (0.3)	0.70	1,250.00	\$875.00
04/10/2023	HRW	OIC	Review emails from T. Cooke and J. Morris re: HCLOM objection (0.2).	0.20	825.00	\$165.00
04/10/2023	HRW	OIC	Review reply in support of HCLOM objection (0.1).	0.10	825.00	\$82.50
04/12/2023	HRW	OIC	Review email from M. Aigen re: Stay Stipulation for HCLOM Objection (0.1).	0.10	825.00	\$82.50



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Highland Capital Management LP
James P. Seery, Jr.
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100 Crescent Court, Suite 1850
Dallas, TX 75201

May 31, 2023
Invoice 132623
Client 36027.00003

RE: Post-Effective Date

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2023

[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 16
 Invoice 136183
 December 1, 2023

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
			[REDACTED]		[REDACTED]

Claims Administration and Objections

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	0.20	1,275.00	\$255.00	
11/16/2023	HRW	CO	Review email from J. Morris re: HCLOM objection and next steps (0.1).	0.10	825.00	\$82.50
11/16/2023	HRW	CO	Review Acis response to HCLOM objection (0.2).	0.20	825.00	\$165.00
11/17/2023	HRW	CO	Review emails from J. Seery, J. Morris re: HCLOM Objection and Acis motion to intervene (0.3).	0.30	825.00	\$247.50
11/22/2023	HRW	CO	Review emails from J. Morris, Z. Annable re: notice to life stay on HCLOM objection (0.2).	0.20	825.00	\$165.00
11/27/2023	HRW	CO	Review emails from J. Morris, J. Seery, D. Perez re: schedule for the HCLOM objection (0.2).	0.20	825.00	\$165.00
11/27/2023	HRW	CO	Review HCLOM Objection and related briefing (0.4).	0.40	825.00	\$330.00

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 29
 Invoice 136183
 December 1, 2023

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Other Insider Claims

11/16/2023	JAM	OIC	Review pleadings on HCLOM objection, including Acis motion to intervene (0.8); e-mail to J. Seery, D. Klos, J. Pomerantz, re: status of HCLOM objection and Acis motion to intervene (0.8)	1.60	1,550.00	\$2,480.00
11/22/2023	JAM	OIC	[REDACTED] of intent to restart HCLOM claim [REDACTED] J. Seery, [REDACTED] Pomerantz, G. Demo, [REDACTED] re: notice of intent to restart [REDACTED]	[REDACTED]	1,550.00	\$620.00
11/23/2023	JAM	OIC	Draft e-mail to counsel re: intent to restart HCMLP's objection to the HCLOM claim (0.3).	0.30	1,550.00	\$465.00
11/27/2023	JAM	OIC	E-mail to J. Seery, D. Klos, T. Cournoyer, J. Pomerantz, G. Demo, H. Winograd re: proposed discovery schedule for HCLOM claim objection litigation (0.3).	0.30	1,550.00	\$465.00
11/28/2023	JAM	OIC	E-mail to S. Bates, D. Perez re: proposed schedule for objection to HCLOM scheduled claims (0.4).	0.40	1,550.00	\$620.00
				3.00		\$4,650.00

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



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100 Crescent Court, Suite 1850
Dallas, TX 75201

December 31, 2023
Invoice 137393
Client 36027.00003

RE: Post-Effective Date

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/2023

[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]		
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



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Highland Capital Management LP
James P. Seery, Jr.
Highland Capital Management LP
100 Crescent Court, Suite 1850
Dallas, TX 75201

April 30, 2024
Invoice 138912
Client 36027.00003

RE: Post-Effective Date

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2024

[REDACTED]

[REDACTED]



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Los Angeles, CA 90067

Highland Capital Management LP
James P. Seery, Jr.
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100 Crescent Court, Suite 1850
Dallas, TX 75201

May 31, 2024
Invoice 139547
Client 36027.00003

RE: Post-Effective Date

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2024

[REDACTED]

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 18
 Invoice 139547
 May 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Other Insider Claims

05/01/2024	JNP	OIC	Conference with J. Morris regarding ACIS intervention in HCLOM matter.	0.10	1,725.00	\$172.50
05/02/2024	JAM	OIC	E-mail to DDP, S. Bates, J. Pomerantz, G. Demo, H. Winograd re: proposed schedule for litigation of HCLOM claim objection and related motion to intervene filed by Acis (0.5).	0.50	1,695.00	\$847.50
05/03/2024	HRW	OIC	Review email from J. Morris re: notice fo resume HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
05/13/2024	HRW	OIC	Review emails from Z. Annable, J. Seery, J. Morris re: scheduling stipulation for litigation of HCLOM objection (0.2).	0.20	1,075.00	\$215.00
05/13/2024	JAM	OIC	E-mail to S. Bates, DDP re: HCLOM stipulation (0.2).	0.20	1,695.00	\$339.00

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 Highland Capital Management LP
 Client 36027.00003

Page: 11
 Invoice 141239
 August 23, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/11/2024	IDK	BL	E-mails with J Morris re his request for analysis on issues re assertions re HCLOM in our objection to the Acis claim, review briefly related pleadings and consider next steps.	0.60	1,795.00	\$1,077.00
07/11/2024	JAM	BL	Begin diligence for litigation of HCLOM claim objection (1.3); e-mail to I. Kharasch, G. Demo, J. Pomerantz, H. Winograd re: background facts concerning HCLOM claim objection (0.2); preliminary work on discovery demands for HCLOM claim objection (0.5).	2.00	1,695.00	\$3,390.00
07/12/2024	GVD	BL	Correspondence with J Morris re HCLOM custodians	0.20	1,395.00	\$279.00
07/12/2024	HRW	BL	Review emails from G. Demo, J. Morris, J. Seery re: HCLOM Objection and the preparation of the Debtor's Schedules (0.3).	0.30	1,075.00	\$322.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 12
 Invoice 141239
 August 23, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/12/2024	HRW	BL	Review emails from J. Morris, J. Seery re: HCLOM claim objection diligence materials (0.2).	0.20	1,075.00	\$215.00
			[REDACTED]			
07/12/2024	IDK	BL	E-mails with J Morris, others re his E-mail to Surgent on HCLOM, schedules, discovery responses, and claim objection issues, memo re representation made in objection, and review objections and prior correspondence with client at the time.	1.40	1,795.00	\$2,513.00
07/12/2024	JAM	BL	Review and analysis of facts for purposes of creating search terms/discovery in HCLOM claim objection litigation (0.9); e-mail to T.	1.70	1,695.00	\$2,881.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
07/14/2024	HRW	BL	Review email from J. Morris re: written discovery for HCLOM claim objection (0.1).	0.10	1,075.00	\$107.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 13
 Invoice 141239
 August 23, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/14/2024	JAM	BL	Complete drafts of document requests, RFAs, and interrogatories for HCLOM claim objection litigation (the "HCLOM discovery") (1.7); email to J. Seery, D. Klos, J. Pomerantz, G. Demo, H. Winograd re: HCLOM Discovery (0.2).	1.90	1,695.00	\$3,220.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
07/15/2024	HRW	BL	Review email from T. Surgent re: search terms for HCLOM objection (0.1).	0.10	1,075.00	\$107.50
			[REDACTED]			\$3,220.50
			[REDACTED]			
			[REDACTED]			
07/15/2024	JAM	BL	Communications w/ counsel to the Acis and HCLOM re: proposed order denying Acis motion to intervene (0.1); communications w/ Z. Annable re: proposed order denying Acis motion to intervene (0.1).	0.20	1,695.00	\$339.00
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 18
 Invoice 141239
 August 23, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
07/25/2024	HRW	BL	Review emails from J. Morris, D. Klos, J. Seery re: discovery requests for HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
07/25/2024	JAM	BL	Review J. Seery and D. Klos comments to draft discovery demands for HCLOM claim objection (0.2); tel c. w/ J. Seery re: HCLOM claim objection and written discovery (0.5).	0.70	1,695.00	\$1,186.50
07/25/2024	JAM	BL	Revise written discovery demands for HCLOM claim objection (0.6); e-mail to J. Seery, D. Klos, J. Pomerantz, H. Winograd re: written discovery for HCLOM claim objection (0.2).	0.80	1,695.00	\$1,356.00



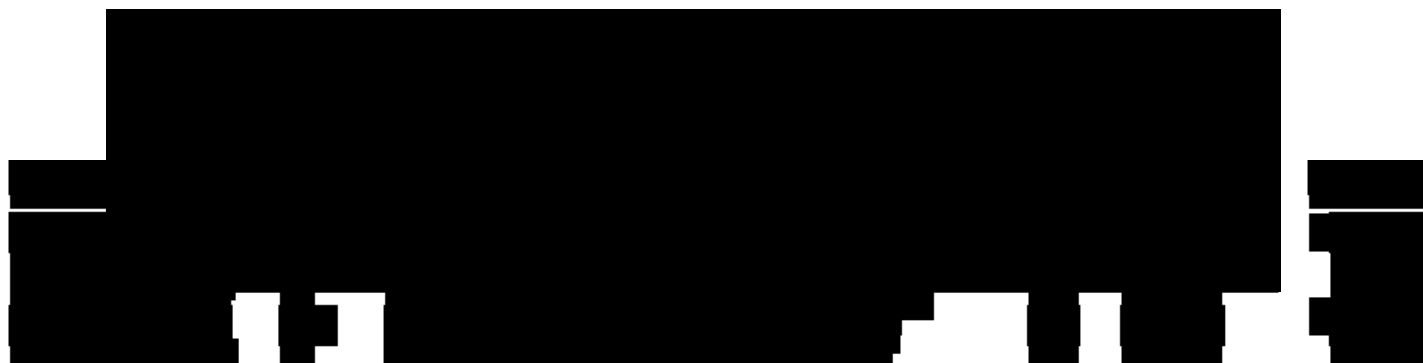
10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

Highland Capital Management LP
James P. Seery, Jr.
Highland Capital Management LP
100 Crescent Court, Suite 1850
Dallas, TX 75201

August 31, 2024
Invoice 142317
Client 36027.00003

RE: Post-Effective Date

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 08/31/2024



Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 9
 Invoice 142317
 August 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/01/2024	HRW	BL	Review email from D. Klos re: background documents in connection with HCLOM discovery (0.1).	0.10	1,075.00	\$107.50
			[REDACTED]			
08/01/2024	JAM	BL	Zoom call w/ J. Seery, D. Klos, H. Winograd re: HCLOM discovery demands (1.8); Zoom call w/ G. Demo re: document review for HCLOM claim objection litigation (0.5).	2.30	1,695.00	\$3,898.50
			[REDACTED]			
			[REDACTED]			
08/02/2024	GVD	BL	Review HCLOM filings re discovery review	0.90	1,395.00	\$1,255.50
			[REDACTED]			.50
08/02/2024	JAM	BL	[REDACTED]; tel c. w/ J. Seery, D. Klos re: HCLOM matters (0.5); [REDACTED]	0.50	1,695.00	\$847.50
08/03/2024	ATB	BL	Download processed 7/18/24 searches from Global Relay for upload to Everlaw.	1.00	595.00	\$595.00
08/03/2024	ATB	BL	Begin processing 7/18 searches re: HCLOM for upload to Everlaw.	1.00	595.00	\$595.00
			[REDACTED]			
08/04/2024	ATB	BL	Upload processed files re: HCLOM searches to Everlaw	0.50	595.00	\$297.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 10
 Invoice 142317
 August 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/05/2024	GVD	BL	Review correspondence re Dondero plan issues and HCLOM note.	0.30	1,395.00	\$418.50
08/06/2024	ATB	BL	Open new project database for HCLOM discovery; coordinate upload of docs.	1.00	595.00	\$595.00
08/07/2024	HRW	BL	Review emails from G. DeMo, A. Bates re document review in connection with HCLOM discovery (0.2).	0.20	1,075.00	\$215.00
08/07/2024	PJJ	BL	Review Everlaw HCLOM discovery.	0.50	595.00	\$297.50
08/08/2024	GVD	BL	Review discovery re HCLOM matter.	4.70	1,395.00	\$6,556.50
08/09/2024	GVD	BL	Review HCLOM discovery materials	6.10	1,395.00	\$8,509.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 11
 Invoice 142317
 August 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]00
08/12/2024	GVD	BL	Review HCLOM discovery material (5.1); [REDACTED]	6.80	1,395.00	\$9,486.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
08/12/2024	HRW	BL	Draft responses and objections to HCLOM discovery requests (0.6).	0.60	1,075.00	\$645.00
08/12/2024	HRW	BL	Review HCLOM claim objection (0.4).	0.40	1,075.00	\$430.00
08/12/2024	JAM	BL	Tel c. w/ J. Seery, T. Courmoyer, T. Surgent, D. Klos, G. Demo re: facts/background/documents concerning HCLOM objection/litigation (1.6).	1.60	1,695.00	\$2,712.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
08/13/2024	GVD	BL	Review HCLOM discovery materials	3.00	1,395.00	\$4,185.00
08/13/2024	GVD	BL	Conference with PSZJ working group re HCLOM discovery issues	0.30	1,395.00	\$418.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 13
 Invoice 142317
 August 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/14/2024	HRW	BL	Review emails from G. Demo, T. Cournoyer re: HCLOM document review (0.2).	0.20	1,075.00	\$215.00
						95.00
08/15/2024	ATB	BL	Review and process HCLOM discovery production in Everlaw; correspond with client re: modifying search terms and de-duping.	2.20	595.00	\$1,309.00
08/15/2024	GVD	BL	Conference with HCMLP working group re HCLOM discovery (0.6); review HCLOM discovery (6.1)	6.70	1,395.00	\$9,346.50
08/15/2024	HRW	BL	Call with J. Morris, J. Seery, D. Klos, A. Bates, G. Demo, D. Klos, T. Cournoyer re: HCLOM discovery in response to requests for production (0.7).	0.70	1,075.00	\$752.50
08/15/2024	HRW	BL	Review email from G. Demo re: HCLOM document production in response to requests for production (0.1).	0.10	1,075.00	\$107.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 18
 Invoice 142317
 August 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/22/2024	ATB	BL	Draft deposition notice; related subpoena; and 30(b)(6) deposition notice for HCLOM entities.	1.60	595.00	\$952.00
08/22/2024	HRW	BL	Review emails from A. Bates, D. Klos re: HCLOM document production (0.2).	0.20	1,075.00	\$215.00
08/22/2024	HRW	BL	Email with J. Morris, J. Seery, D. Klos re: revised responses and objections to HCLOM discovery requests (0.2).	0.20	1,075.00	\$215.00
08/22/2024	HRW	BL	Email with A. Bates re: responses and objections to HCLOM discovery requests (0.3).	0.30	1,075.00	\$322.50
08/22/2024	HRW	BL	Review and edit responses and objections to HCLOM discovery requests (0.5).	0.50	1,075.00	\$537.50
08/22/2024	JAM	BL	Tel c. w/ J. Seery re: litigation matters (0.2); e-mails w/ M. Gray, A. Bates re: facts, timeline, and related matters (0.2); e-mails w/ H. Winograd re: litigation matters (0.1); e-mails w/ HCMLP team re: HCLOM discovery issues (0.2).	0.70	1,695.00	\$1,186.50
08/23/2024	ATB	BL	HCLOM- draft verification; finalize production and Exhibit A to RFPs; download Acis production to Everlaw.	1.80	595.00	\$1,071.00

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 20
 Invoice 142317
 August 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/23/2024	JAM	BL	Review final version of written responses to HCLOM discovery (0.4); e-mails w/ H. Winograd, A. Bates re: service of written responses and document production (HCLOM claim objection) (0.3).	0.70	1,695.00	\$1,186.50
08/23/2024	JAM	BL	Communications w/ J. Seery, H. Winograd re: verification of interrogatories (0.2); preliminary review of HCLOM's responses to discovery (0.2); e-mails w/ M. Aigen, DDP re: HCLOM's responses to discovery (0.1).	0.50	1,695.00	\$847.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
08/26/2024	HRW	BL	Email with A. Bates, J. Morris re: deposition notices in connection with HCLOM contested matter (0.2).	0.20	1,075.00	\$215.00
08/26/2024	HRW	BL	Draft deposition notices in connection with HCLOM contested matter (1.6).	1.60	1,075.00	\$1,720.00
			[REDACTED]			
			[REDACTED]			
08/26/2024	JAM	BL	Tel c. w/ J. Seery re: HCLOM facts and issues (0.7); [REDACTED]	0.90	1,695.00	\$1,525.50
			[REDACTED]			

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 22
 Invoice 142317
 August 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
08/29/2024	JAM	BL	Review draft responses to HCLOM discovery (0.4); review documents/emails concerning HCLOM facts (0.8).	1.20	1,695.00	\$2,034.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
08/30/2024	HRW	BL	Review emails from J. Morris, J. Seery, D. Klos, M. Aigen re: scheduling for HCLOM depositions and related matters (0.3).	0.30	1,075.00	\$322.50
08/30/2024	HRW	BL	Email with J. Morris re: scheduling for HCLOM depositions and related matters (0.3).	0.30	1,075.00	\$322.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 5
 Invoice 142604
 October 9, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Bankruptcy Litigation						
09/01/2024	JAM	BL	Review HCLOM Rule 30(b)(6) notice (0.2); e-mail to J. Seery, D. Klos, H, Winograd re: Rule 30(b)(6) notice (0.1); review documents concerning re-set for HCLOM litigation (0.5).	0.80	1,695.00	\$1,356.00
09/01/2024	JAM	BL	tel c. w/ J. Seery re: HCLOM facts and strategy (0.4).	0.50	1,695.00	\$847.50
09/03/2024	HRW	BL	Review emails from J. Morris, M. Aigen, Z. Annable re: amended Dondero subpoena in connection with HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
09/03/2024	HRW	BL	Review emails from J. Morris, Z. Annable, J. Seery re: amended 30(b)(6) deposition notice in connection with HCLOM litigation (0.2).	0.20	1,075.00	\$215.00

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 6
 Invoice 142604
 October 9, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/03/2024	HRW	BL	Review amended amended 30(b)(6) deposition notice in connection with HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
			[REDACTED]			
09/03/2024	JAM	BL	E-mail to Z. Annable re: Amended Rule 30(b)(6) notice (0.1); e-mails w/ Court re: setting for hearing on HCLOM claim objection (0.2); begin preparing for depositions (2.0); review emails re: facts for HCLOM litigation (0.8).	3.10	1,695.00	\$5,254.50
09/03/2024	JAM	BL	Revise subpoena and Notice for Dondero deposition (0.3); tel c. w/ J. Seery re: facts and [REDACTED] tel	0.70	1,695.00	\$1,186.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
09/04/2024	HRW	BL	Calls with J. Morris re: HCLOM deposition preparation (0.2).	0.20	1,075.00	\$215.00
09/04/2024	HRW	BL	Email with J. Morris, A. Bates re: HCLOM document production and related matters (0.2).	0.20	1,075.00	\$215.00

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 8
 Invoice 142604
 October 9, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/06/2024	GVD	BL	Review multiple correspondence re status of HCLOM discovery	0.20	1,395.00	\$279.00
			[REDACTED]			
09/06/2024	HRW	BL	Email with J. Morris, G. Demo, A. Bates re: HCLOM deposition documents and related issues (0.3).	0.30	1,075.00	\$322.50
09/06/2024	HRW	BL	Call with T. Cournoyer, M. Gray, D. Klos, A. Bates re: HCLOM documents needed for deposition preparation (0.2).	0.20	1,075.00	\$215.00
09/06/2024	HRW	BL	Email with M. Gray, A. Bates, D. Klos, T. Cournoyer re: HCLOM production issues (0.5).	0.50	1,075.00	\$537.50
09/06/2024	JAM	BL	Review DDP email re: setting for HCLOM	1.10	1,695.00	\$1,864.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
09/09/2024	ATB	BL	Coordinate court reporter for HCLOM depositions.	0.50	595.00	\$297.50
09/09/2024	ATB	BL	Coordinate with Everlaw re: re-formatting HCLOM production; download link for same.	1.30	595.00	\$773.50
09/09/2024	HRW	BL	Email with J. Morris re: document review in connection with HCLOM production (0.1).	0.10	1,075.00	\$107.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 9
 Invoice 142604
 October 9, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/09/2024	HRW	BL	Review and analyze HCLOM production (0.5).	0.50	1,075.00	\$537.50
09/09/2024	HRW	BL	Call with J. Morris re: HCLOM settlement proposal (0.1).	0.10	1,075.00	\$107.50
09/09/2024	HRW	BL	Call with D. Perez, M. Aigen, J. Morris re: HCLOM settlement proposal (0.2).	0.20	1,075.00	\$215.00
09/09/2024	HRW	BL	Review emails from J. Morris re: HCLOM settlement proposal (0.1).	0.10	1,075.00	\$107.50
09/09/2024	HRW	BL	Review emails from J. Morris, D. Perez re: scheduling of trial and related matters for HCLOM contested matter (0.3).	0.30	1,075.00	\$322.50
09/09/2024	HRW	BL	Email with J. Morris, A. Bates re: discovery issues for HCLOM contested matter (0.2).	0.20	1,075.00	\$215.00
09/09/2024	HRW	BL	Review email from A. Bates re: depositions	0.10	1,075.00	\$107.50
09/09/2024	JAM	BL	Tel c. w/ G. Demo re: status of HCLOM litigation (0.2); tel c. w/ A. Bates re: document production issues in HCLOM (0.1); tel c. w/ J. Seery re: HCLOM settlement offer letter and related matters (0.2).	0.50	1,695.00	\$847.50
09/09/2024	JAM	BL	E-mail to DDP, M. Aigen, G. Demo, H. Winograd re: setting, discovery and related matters in HCLOM (0.5); review documents/emails re: HCLOM facts (2.0); Zoom call w/ DDP, M. Aigen, H. Winograd re: potential HCLOM resolution (0.2).	2.70	1,695.00	\$4,576.50
09/09/2024	JAM	BL	Review/revise/send settlement letter on HCLOM (0.2); email to J. Seery, D. Klos re: communications w/ DDP concerning settlement (0.1); tel c. w/ J. Seery re: HCLOM litigation matters (0.4).	0.70	1,695.00	\$1,186.50

[REDACTED]

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 10
 Invoice 142604
 October 9, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/10/2024	HRW	BL	Review email from A. Bates re: deposition scheduling in HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
09/10/2024	HRW	BL	Review emails from J. Morris, D. Perez re: hearing schedule for HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
09/10/2024	JAM	BL	Prepare for depositions in HCLOM litigation (2.8); Teams call w/ HCMLP team and A. Bates (partial) re: HCLOM litigation (3.0).	5.80	1,695.00	\$9,831.00
09/10/2024	JAM	BL	E-mails w/ DDP, M. Aigen re: setting, discovery issues (0.2); tel c. w/ DDP re: HCLOM settlement, setting (0.1); tel c. w/ J. Seery re: deposition prep (0.2).	0.40	1,695.00	\$678.00
09/11/2024	HRW	BL	Review emails from J. Morris re: setting for HCLOM claim objection hearing (0.1).	0.10	1,075.00	\$107.50
09/11/2024	JAM	BL	Prepare for depositions (4.7); tel c. w/ J. Seery re: HCLOM facts (0.2); e-mails w/ J. Seery, D. Klos re: settlement/setting issues (0.2); tel c. w/ J. Seery re: deposition prep (0.2).	5.30	1,695.00	\$8,983.50
09/12/2024	HRW	BL	Review emails from J. Morris, G. Demo, M. Aigen re: Waterhouse testimony in connection with HCLOM litigation (0.2).	0.20	1,075.00	\$215.00

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 11
 Invoice 142604
 October 9, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/12/2024	HRW	BL	Review emails from J. Morris, D. Perez, M. Aigen re: deposition scheduling and related issues in connection with HCLOM litigation (0.3).	0.30	1,075.00	\$322.50
			[REDACTED]			
			[REDACTED]			
09/12/2024	JAM	BL	Tel c. w/ J. Seery re: facts, strategy for HCLOM claim objection (0.3); tel c. w/ D. Klos re: facts concerning HCLOM claim	0.60	1,695.00	\$1,017.00
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
09/13/2024	JAM	BL	Tel c. w/ G. Demo re: litigation matters (0.2); e-mails w/ Court, J. Seery, Z. Annable, others re: setting for HCLOM litigation (0.3); tel c. w/ J. Seery re: litigation matters (0.3)	0.80	1,695.00	\$1,356.00

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 15
 Invoice 142604
 October 9, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/23/2024	JAM	BL	Prepare for Waterhouse deposition (including meeting w/ D. Klos and Teams call w/ J. Seery, D. Klos) (9.2).	9.20	1,695.00	\$15,594.00
			[REDACTED]			
09/24/2024	JAM	BL	Prepare for Waterhouse Deposition (5.3); Waterhouse deposition (7.2).	12.50	1,695.00	\$21,187.50
09/24/2024	JAM	BL	Tel c. w/ J. Seery re: Waterhouse deposition (0.1); [REDACTED]; [REDACTED]; tel c. w/ D. Klos, J. Seery re: HCLOM depositions (0.2); tel c. w/ D. Klos re: HCLOM deposition (0.1).	0.70	1,695.00	\$1,186.50
09/24/2024	JNP	BL	Conference with J. Morris regarding HCLOM depositions and litigation issues.	0.40	1,725.00	\$690.00
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			.50
09/26/2024	ATB	BL	Pull production version of HCLOM documents; email to client and team.	2.40	595.00	\$1,428.00
09/26/2024	ATB	BL	Begin pulling HCLOM production documents.	2.20	595.00	\$1,309.00
			[REDACTED]			
09/26/2024	JAM	BL	E-mail to J. Seery, D. Klos re: factual analyses of HCLOM issues (0.8); review of issues/documents from HCLOM depositions (0.3); tel c. w/ J. Seery re: HCLOM litigation (0.2).	1.30	1,695.00	\$2,203.50



PACHULSKI
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Highland Capital Management LP
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Dallas, TX 75201

October 31, 2024
Invoice 143199
Client 36027.00003

RE: Post-Effective Date

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 10/31/2024

[REDACTED]

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 6
 Invoice 143199
 October 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/02/2024	HRW	BL	Review emails from J. Morris, D. Klos, J. Seery re: deposition scheduling for HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
10/02/2024	HRW	BL	Review emails from J. Morris, M. Aigen re: Waterhouse deposition in HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
10/02/2024	JAM	BL	[REDACTED] [REDACTED] e-mails w/ D. Klos, J. Seery re: Klos HCLOM transcript (0.1).	0.50	1,695.00	\$847.50
10/02/2024	JAM	BL	E-mail to M. Aigen, DDP re: Waterhouse HCLOM transcript (0.1); e-mail w/ D. Klos, J. Seery re: Klos Waterhouse transcript (0.1); preliminary review of Waterhouse transcript and emails w/ J. Seery, D. Klos concerning the same (0.6).	0.80	1,695.00	\$1,356.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/03/2024	HRW	BL	Review emails from Z. Annable, J. Morris re: amended deposition subpoenas for HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/04/2024	JAM	BL	Review documents concerning HCLOM/Acis (0.8); e-mails w/ J. Seery, D. Klos, M. Grey re: HCLOM documents (0.2).	1.00	1,695.00	\$1,695.00
10/05/2024	JAM	BL	E-mail to DDP, M. Aigen, H. Winograd re: setting for HCLOM claim objection in light of Fifth Circuit argument on admin claim (0.2).	0.20	1,695.00	\$339.00
10/07/2024	ATB	BL	Bates stamp supp HCLOM docs for production.	0.30	595.00	\$178.50
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/07/2024	HRW	BL	Review email from J. Morris re: supplemental production in HCLOM litigation (0.1).	0.10	1,075.00	\$107.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 7
 Invoice 143199
 October 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/07/2024	HRW	BL	Review emails from J. Morris, J. Seery, D. Perez re: hearing on HCLOM litigation (0.3).	0.30	1,075.00	\$322.50
10/07/2024	HRW	BL	Call with J. Morris re: HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
10/07/2024	HRW	BL	Review email from J. Morris re: amended notice of subpoena for Dondero in HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
10/08/2024	HRW	BL	Email with J. Morris, G. Demo, J. Pomerantz re: hearing on HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
10/08/2024	HRW	BL	Review email from Z. Annable re: hearing on HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
10/08/2024	HRW	BL	Review notice of hearing on HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
10/08/2024	JNP	BL	Conference with J. Morris regarding HCLOM claim objection.	0.30	1,725.00	\$517.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 8
 Invoice 143199
 October 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/10/2024	HRW	BL	Review emails from J. Morris re: deposition scheduling for HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
10/13/2024	JAM	BL	Review H&W opinion letter re: Acis/Highland Participation Agreement (0.4).	0.40	1,695.00	\$678.00
			[REDACTED]			
			[REDACTED]			
10/14/2024	HRW	BL	[REDACTED] supplemental	0.10	1,075.00	\$107.50
			[REDACTED] e-			
			supplemental production of documents (HCLOM)(0.1); e-mails w/ T. Cooke re: document production in Acis case (0.1).			
			[REDACTED]			
10/15/2024	ATB	BL	Draft witness and exhibit list for 12/18/24 hearing.	1.10	595.00	\$654.50
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			
			[REDACTED]			

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 11
 Invoice 143199
 October 31, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/30/2024	HRW	BL	Review emails from J. Morris, M. Aigen re: depositions in connection with HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/31/2024	HRW	BL	Review email from M. Aigen re: depositions in connection with HCLOM litigation (0.1).	0.10	1,075.00	\$107.50



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James P. Seery, Jr.
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100 Crescent Court, Suite 1850
Dallas, TX 75201

December 12, 2024
Invoice 143602
Client 36027.00003

RE: Post-Effective Date

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/2024

[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 16
 Invoice 143602
 December 12, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/05/2024	HRW	H	Email with J. Morris, D. Klos, D. Perez re: HCLOM discovery issues (0.2).	0.20	1,075.00	\$215.00
11/05/2024	HRW	H	Review email from A. Bates re: transcript of Dondero deposition in HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
11/05/2024	JAM	H	Prepare for HCLOM litigation (0.3); e-mails w/ HCMLP team re: documents/exhibits (0.2); e-mail to HCMLP team re: HCLOM accounting issues (0.6).	1.10	1,695.00	\$1,864.50
11/05/2024	JAM	H	Zoom call w/ J. Seery, D. Klos, T. Cournoyer, M. Gray re: HCLOM strategy and deposition preparation (2.6); e-mails w/ G. Demo re: successor trustee issues (0.2); e-mails w/ A. Bates re: documents and W&E list (0.3).	3.10	1,695.00	\$5,254.50
11/06/2024	HRW	H	[REDACTED] D. Perez re: HCLOM discovery issues (0.1).	[REDACTED]	1,075.00	[REDACTED]
11/06/2024	HRW	H	[REDACTED] Review and edit response to letter from D. [REDACTED] z re: HCLOM discovery issues (0.4).	0.40	1,075.00	\$430.00
11/06/2024	HRW	H	[REDACTED] Email with J. Morris, J. Seery, D. Klos, A. Bates, T. Cournoyer, T. Surgent re: response to letter from D. Perez re: HCLOM discovery issues (0.3).	0.30	1,075.00	\$322.50
11/06/2024	HRW	H	Review email from J. Morris re: response to letter from D. Perez re: HCLOM discovery issues (0.1).	0.10	1,075.00	\$107.50
11/06/2024	HRW	H	Review emails from J. Morris re: deposition scheduling in HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
11/06/2024	HRW	H	Email with J. Morris re: preparation for HCLOM evidentiary hearing (0.2).	0.20	1,075.00	\$215.00
11/06/2024	HRW	H	Call with J. Morris, J. Seery, D. Klos, A. Bates, T. Cournoyer, T. Surgent re: HCLOM discovery issues (0.7).	0.70	1,075.00	\$752.50
11/06/2024	HRW	H	Email with J. Morris, J. Seery, D. Klos, A. Bates, T. Cournoyer, T. Surgent re: HCLOM discovery issues (0.3).	0.30	1,075.00	\$322.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 17
 Invoice 143602
 December 12, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/06/2024	JAM	H	E-mails w/ D. Klos re: Dameris documents (0.1); e-mails w/ Dameris' counsel re: document production (0.1); tel c. w/ J. Seery re: litigation matters (0.2).	0.40	1,695.00	\$678.00
11/06/2024	JAM	H	Review/analyze DDP discovery letter (0.3); Zoom call w/ HCMLP team, H. Winograd, A. Bates re: document searches and response to DDP discovery letter (0.6); draft response to DDP discovery letter (0.5).	1.40	1,695.00	\$2,373.00
11/06/2024	JAM	H	E-mails w/ J. Seery, D. Klos, H. Winograd re: response to DDP discovery letter (0.2); revise response to DDP's discovery letter (0.4).	0.60	1,695.00	\$1,017.00
11/07/2024	HRW	H	Email with J. Morris, A. Bates re: HCLOM document production (0.2).	0.20	1,075.00	\$215.00
11/07/2024	HRW	H	[REDACTED] J. Morris re: HCLOM document production (0.1).	[REDACTED]	1,075.00	[REDACTED]
11/07/2024	HRW	H	[REDACTED] Review emails from J. Morris, M. Aigen re: [REDACTED] deposition scheduling for HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
11/07/2024	HRW	H	Review witness and exhibit list for HCLOM evidentiary hearing (0.1).	0.10	1,075.00	\$107.50
11/07/2024	HRW	H	Email with A. Bates, J. Morris re: witness and exhibit list for HCLOM evidentiary hearing (0.1).	0.10	1,075.00	\$107.50
11/07/2024	HRW	H	Email with A. Bates re: HCLOM depositions and related matters (0.3).	0.30	1,075.00	\$322.50
11/07/2024	HRW	H	Call with A. Bates re: HCLOM depositions and related matters (0.2).	0.20	1,075.00	\$215.00
11/07/2024	HRW	H	Call with J. Morris re: HCLOM case background and related issues (1.2).	1.20	1,075.00	\$1,290.00
11/07/2024	HRW	H	Review Frank Waterhouse deposition transcript (2.5).	2.50	1,075.00	\$2,687.50
11/07/2024	JAM	H	Tel c. w/ H. Winograd re: HCLOM facts and strategy (1.2); review documents and work on W&E list (3.1).	4.30	1,695.00	\$7,288.50

Pachulski Stang Ziehl & Jones LLP Highland Capital Management LP Client 36027.00003	Page: 18 Invoice 143602 December 12, 2024
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/07/2024	JAM	H	E-mail to DDP, M. Aigen re: document production in response to 11/11 letter (0.1); e-mails w/ J. Seery, T. Cournoyer, M. Aigen re: deposition schedule (0.1).	0.20	1,695.00	\$339.00
11/08/2024	HRW	H	Email with A. Bates, J. Morris, D. Klos re: witness and exhibit list for HCLOM evidentiary hearing (0.3).	0.30	1,075.00	\$322.50
11/08/2024	HRW	H	Email with A. Bates, J. Morris, M. Aigen re: deposition scheduling for HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
11/08/2024	HRW	H	Review trial exhibits for HCLOM litigation (1.0).	1.00	1,075.00	\$1,075.00
11/08/2024	HRW	H	Continue to review Frank Waterhouse deposition transcript and related documents in [REDACTED] HCLOM litigation(6.5).	6.50	1,075.00	\$6,987.50
11/08/2024	JAM	H	[REDACTED] w/ J. Seery, T. Cournoyer, D. Klos, M. Gray re: HCLOM facts and deposition preparation (2.2); tel c. w/ J. Seery re: HCLOM issues (0.3); e-mails w/ M. Gray re: documents/exhibits (0.2).	[REDACTED]	1,695.00	\$4,576.50
11/08/2024	JAM	H	E-mails to A. Bates, H. Winograd re: W&E list and related matters (0.3); review/analysis of factual issues concerning HCLOM claim objection (2.1).	2.40	1,695.00	\$4,068.00
11/10/2024	JAM	H	Review Dondero deposition transcript and documents in preparation for HCLOM litigation (2.5).	2.50	1,695.00	\$4,237.50
11/11/2024	GVD	H	Review transcript of Dondero HCLOM deposition	0.60	1,395.00	\$837.00
11/11/2024	HRW	H	Review emails from J. Morris re: Dondero and Waterhouse depositions in connection with HCLOM litigation	0.20	1,075.00	\$215.00
11/11/2024	HRW	H	Email with J. Seery, M. Gray, T. Cournoyer, J. Morris re: documents in connection with HCLOM litigation	0.30	1,075.00	\$322.50
11/11/2024	HRW	H	Review and analyze materials in connection with HCLOM litigation, including Waterhouse and Dondero deposition transcripts	5.50	1,075.00	\$5,912.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 19
 Invoice 143602
 December 12, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/11/2024	JAM	H	Prepare for HCLOM (4.8); tel c. w/ J. Seery re: HCLOM claim objection (0.3); tel c. w/ A. Bates re: W&E list (0.2).	5.30	1,695.00	\$8,983.50
11/12/2024	HRW	H	Calls with J. Morris re: HCLOM trial preparation (0.3).	0.30	1,075.00	\$322.50
11/12/2024	HRW	H	Email with J. Morris re: HCLOM trial preparation (0.2).	0.20	1,075.00	\$215.00
11/12/2024	HRW	H	Email with F. MacAdam re: Cayman research issues in connection with HCLOM litigation (0.3).	0.30	1,075.00	\$322.50
11/12/2024	HRW	H	Review emails from A. Bates, J. Morris, D. Klos, M. Gray re: witness and exhibit list in connection with HCLOM hearing (0.3).	0.30	1,075.00	\$322.50
11/12/2024	HRW	H	Email with A. Bates re: HCLOM trial exhibits in connection with trial (0.2).	0.20	1,075.00	\$215.00
11/12/2024	HRW	H	Review and analyze trial exhibits in connection with trial preparation for HCLOM hearing (1.5).	1.50	1,075.00	\$1,612.50
11/12/2024	HRW	H	Review and analyze deposition transcripts in connection with HCLOM litigation (3.5).	3.50	1,075.00	\$3,762.50
11/12/2024	JAM	H	Prepare for HCLOM (5.5); Zoom call w/ J. Seery, D. Klos, T. Cournoyer, M. Gray re: HCLOM/deposition preparation (2.5); tel c. w/ H. Winograd re: HCLOM claim objection (0.2); tel c. w/ J. Seery re: HCLOM issues (0.3).	8.50	1,695.00	\$14,407.50
11/13/2024	HRW	H	Attend deposition of J. Seery in connection with HCLOM litigation (3.5).	3.50	1,075.00	\$3,762.50
11/13/2024	HRW	H	Meet with J. Morris, J. Seery for client conference in connection with HCLOM litigation (1.0).	1.00	1,075.00	\$1,075.00
11/13/2024	HRW	H	Attend deposition of T. Cournoyer in connection with HCLOM litigation (1.8).	1.80	1,075.00	\$1,935.00
11/13/2024	HRW	H	Call with J. Morris, J. Seery, T. Cournoyer, M. Gray, D. Klos re: Cournoyer deposition debrief in connection with HCLOM litigation (0.3).	0.30	1,075.00	\$322.50

Pachulski Stang Ziehl & Jones LLP Highland Capital Management LP Client 36027.00003	Page: 20 Invoice 143602 December 12, 2024
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/13/2024	HRW	H	Email with M. Gray re: deposition of F. Waterhouse in connection with HCLOM litigation (0.1).	0.10	1,075.00	\$107.50
11/13/2024	HRW	H	Email with F. MacAdam, N. Dunne re: Cayman research issues in connection with HCLOM litigation (0.3).	0.30	1,075.00	\$322.50
11/13/2024	HRW	H	Email with J. Morris, J. Seery re: Acis joint pre-trial order in connection with HCLOM litigation (0.2).	0.20	1,075.00	\$215.00
11/13/2024	HRW	H	Review background materials in connection with HCLOM litigation in preparation for deposition of J. Seery (1.5).	1.50	1,075.00	\$1,612.50
11/13/2024	JAM	H	Prepare for HCLOM claim objection litigation (review of FW deposition transcript) (1.7);	5.40	1,695.00	\$9,153.00
			[REDACTED] HCLOM claim objection and deposition (0.2); Seery deposition (3.5).	[REDACTED]	[REDACTED]	[REDACTED]
11/13/2024	JAM	H	Zoom call w/ HCMLP team, J. Seery, H. [REDACTED] ograd re: HCLOM depositions (1.0); [REDACTED] Cournoyer deposition (2.8); Zoom call w/ HCMLP team, J. Seery, H. Winograd re: Cournoyer deposition (0.3); meet w/ H. Winograd re: HCLOM issues (0.2).	4.30	1,695.00	\$7,288.50
11/14/2024	GVD	H	Multiple conferences with J Seery re HCLOF issues	0.30	1,395.00	\$418.50
11/14/2024	GVD	H	Review and revise draft HCLOF settlement agreement from CLOH/DAF	1.70	1,395.00	\$2,371.50
11/14/2024	GVD	H	Conference with HCLOF directors re revisions to settlement agreement	0.30	1,395.00	\$418.50
11/14/2024	HRW	H	Continue to review and analyze HCLOM exhibits and related background documents in connection with HCLOM litigation	5.00	1,075.00	\$5,375.00
11/14/2024	HRW	H	Draft motion for bad faith finding in connection with HCLOM litigation	3.00	1,075.00	\$3,225.00
11/14/2024	JAM	H	Tel c. w/ J. Seery re: litigation matters (1.1); work on HCLOM litigation (4.8); tel c. w/ H. Winograd re: HCLOM arguments and facts (0.2).	6.10	1,695.00	\$10,339.50

Pachulski Stang Ziehl & Jones LLP
 Highland Capital Management LP
 Client 36027.00003

Page: 21
 Invoice 143602
 December 12, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/15/2024	GVD	H	Review R Boleat revisions to HCLOF settlement agreement and revise same	1.00	1,395.00	\$1,395.00
11/15/2024	GVD	H	Review F Waterhouse transcript in HCLOM	0.20	1,395.00	\$279.00
11/15/2024	HRW	H	Review docket and related pleadings in Acis adversary proceeding in connection with HCLOM litigation	0.50	1,075.00	\$537.50
11/15/2024	HRW	H	Email with Z. Annable, J. Morris re: trial setting in Acis adversary proceeding in connection with HCLOM litigation	0.30	1,075.00	\$322.50
11/15/2024	HRW	H	Email with J. Morris, J. Seery, D. Klos re: document production in HCLOM litigation	0.20	1,075.00	\$215.00
11/15/2024	HRW	H	Email with J. Morris re: Dondero deposition digest in connection with HCLOM litigation	0.10	1,075.00	\$107.50
11/15/2024	HRW	H	[REDACTED] is, D. Klos, A. Bates, M. [REDACTED] re: witness and exhibit list in connection with HCLOM litigation	[REDACTED]	1,075.00	[REDACTED]
11/15/2024	HRW	H	[REDACTED] Draft motion for bad faith finding in connection with HCLOM litigation	[REDACTED]	1,075.00	\$6,450.00
11/15/2024	HRW	H	Email with J. Morris re: Waterhouse deposition digest in connection with HCLOM litigation	0.20	1,075.00	\$215.00
11/15/2024	JAM	H	Work on HCLOM litigation, including completion of Waterhouse digest and review/revise W&E list (4.3); tel c. w/ A. Bates re: W&E list (0.1).	4.40	1,695.00	\$7,458.00
11/15/2024	JAM	H	Tel c. w/ J. Seery re: analysis of HCLOM issues (0.3); e-mail to J. Seery, D. Klos, J. Pomerantz, G. Demo, H. Winograd re: Waterhouse digest (0.1); e-mails to A. Bates re: W&E list (0.3).	0.70	1,695.00	\$1,186.50
11/16/2024	HRW	H	Draft motion for bad faith finding in connection with HCLOM litigation	6.00	1,075.00	\$6,450.00
11/16/2024	JAM	H	Review/revise W&E list (0.8).	0.80	1,695.00	\$1,356.00
11/17/2024	HRW	H	Email with J. Morris re: bad faith motion against HCLOM (0.2).	0.20	1,075.00	\$215.00
11/17/2024	HRW	H	Email with N. Dunne re: research in connection with HCLOM litigation (0.2).	0.20	1,075.00	\$215.00

Pachulski Stang Ziehl & Jones LLP Highland Capital Management LP Client 36027.00003	Page: 22 Invoice 143602 December 12, 2024
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/17/2024	HRW	H	Review Klos transcript in preparation for HCLOM trial (1.0).	1.00	1,075.00	\$1,075.00
11/17/2024	HRW	H	Review research in connection with HCLOM litigation (0.5).	0.50	1,075.00	\$537.50
11/17/2024	HRW	H	Draft motion for bad faith finding against HCLOM and related work (0.5).	0.50	1,075.00	\$537.50
11/17/2024	JAM	H	Work on HCLOM litigation (4.5).	4.50	1,695.00	\$7,627.50
11/18/2024	ATB	H	HCLOM - update witness and exhibit list.	0.80	595.00	\$476.00
11/18/2024	GVD	H	Review J Seery changes to HCLOF settlement and revise same	0.20	1,395.00	\$279.00
11/18/2024	HRW	H	Email with J. Morris re: bad faith motion against HCLOM (0.3).	0.30	1,075.00	\$322.50
11/18/2024	HRW	H	[REDACTED], J. Seery, M. Gray, T. Cournoyer, A. Bates re: bad faith motion against HCLOM (0.4).	[REDACTED]	1,075.00	[REDACTED]
11/18/2024	HRW	H	[REDACTED] with J. Morris re: bad faith motion against HCLOM (0.4).	[REDACTED]	1,075.00	\$430.00
11/18/2024	HRW	H	Call with D. Klos, J. Seery, M. Gray, T. Cournoyer, A. Bates re: bad faith motion against HCLOM (0.7).	0.70	1,075.00	\$752.50
11/18/2024	HRW	H	Draft motion for bad faith finding against HCLOM (7.5).	7.50	1,075.00	\$8,062.50
11/18/2024	JAM	H	Work on Bad Faith motion including detailed outline (4.4); tel c. w/ H. Winograd re: Bad Faith motion (0.4); e-mail to HCMLP team, H. Winograd re: outline for Bad Faith motion (0.1); e-mails w/ D. Klos re: Bad Faith motion (0.2).	5.10	1,695.00	\$8,644.50
11/19/2024	GVD	H	Multiple conferences with J Seery re open issues re HCLOF settlement agreement.	0.60	1,395.00	\$837.00
11/19/2024	GVD	H	Review and revise HCLOF settlement agreement re comments from J Seery.	0.70	1,395.00	\$976.50
11/19/2024	HRW	H	Email with J. Morris re: bad faith motion against HCLOM (0.3).	0.30	1,075.00	\$322.50

Pachulski Stang Ziehl & Jones LLP Highland Capital Management LP Client 36027.00003	Page: 23 Invoice 143602 December 12, 2024
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/19/2024	HRW	H	Email with D. Klos, J. Seery, M. Gray, T. Cournoyer, A. Bates re: bad faith motion against HCLOM (0.2).	0.20	1,075.00	\$215.00
11/19/2024	HRW	H	Calls with J. Morris re: bad faith motion against HCLOM (0.3).	0.30	1,075.00	\$322.50
11/19/2024	HRW	H	Continue to draft bad faith motion against HCLOM (8.0).	8.00	1,075.00	\$8,600.00
11/19/2024	HRW	H	Email with N. Dunne re: Cayman research in connection with bad faith motion against HCLOM (0.1).	0.10	1,075.00	\$107.50
11/19/2024	HRW	H	Call with N. Dunne re: Cayman research in connection with bad faith motion against HCLOM (0.1).	0.10	1,075.00	\$107.50
11/19/2024	JAM	H	Review Motion for Bad Faith Finding and an Award of Attorneys' Fees (the [REDACTED] (8.3); tel c. w/ H. Winograd re: [REDACTED] Motion (0.2); tel c. w/ J. Seery re: Motion [REDACTED]).	[REDACTED]	1,695.00	\$14,746.50
11/19/2024	JAM	H	E-mail to DDP, M. Aigen, H. Winograd re: Motion (0.1); tel c. w/ H. Winograd re: Motion (0.1); email to HCMLP team, H. Winograd re: Motion (0.1).	0.30	1,695.00	\$508.50
11/20/2024	ATB	H	HCLOM - Draft H. Winograd declaration; finalize exhibits.	2.30	595.00	\$1,368.50
11/20/2024	GVD	H	Review drafts of motion for sanctions re HCLOM proof of claim	0.80	1,395.00	\$1,116.00
11/20/2024	HRW	H	Email with D. Klos, J. Seery, M. Gray, T. Cournoyer, A. Bates re: bad faith motion against HCLOM (0.3).	0.30	1,075.00	\$322.50
11/20/2024	HRW	H	Email with A. Bates, I. Soto, Z. Annable, J. Morris re: re: bad faith motion against HCLOM (0.5).	0.50	1,075.00	\$537.50
11/20/2024	HRW	H	Continue to draft bad faith motion against HCLOM and ancillary documents (8.5).	8.50	1,075.00	\$9,137.50
11/20/2024	HRW	H	Calls with A. Bates re: bad faith motion against HCLOM and ancillary documents (0.4).	0.40	1,075.00	\$430.00

Pachulski Stang Ziehl & Jones LLP Highland Capital Management LP Client 36027.00003	Page: 24 Invoice 143602 December 12, 2024
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/20/2024	HRW	H	Calls with J. Morris re: bad faith motion against HCLOM and ancillary documents (0.2).	0.20	1,075.00	\$215.00
11/20/2024	HRW	H	Email with G. Demo, J. Morris, J. Pomerantz re: bad faith motion against HCLOM (0.3).	0.30	1,075.00	\$322.50
11/20/2024	JAM	H	E-mail to HCMLP and PSZJ teams re: Bad Faith brief (0.1); e-mails w/ J. Pomerantz, G. Demo, H. Winograd re: Bad Faith brief and Stinson (0.1); tel c. w/ J. Seery re: Bad Faith brief (0.2).	0.40	1,695.00	\$678.00
11/20/2024	JNP	H	Review motion for bad faith finding and attorneys fees in HCLOM litigation.	0.50	1,725.00	\$862.50
11/21/2024	HRW	H	Email with J. Morris, A. Bates, Z. Annable, I. Soto re: bad faith motion against HCLOM	1.00	1,075.00	\$1,075.00
			[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/21/2024	HRW	H	[REDACTED] D. Klos, J. Seery, M. Gray, T. Cournoyer, A. Bates re: bad faith motion against HCLOM (0.6).	[REDACTED]	1,075.00	\$645.00
			[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
11/21/2024	HRW	H	Calls with J. Morris re: bad faith motion against HCLOM (0.4).	0.40	1,075.00	\$430.00
11/21/2024	HRW	H	Calls with A. Bates re: bad faith motion against HCLOM (0.4).	0.40	1,075.00	\$430.00
11/21/2024	HRW	H	Calls with I. Soto re: bad faith motion against HCLOM (0.2).	0.20	1,075.00	\$215.00
11/21/2024	HRW	H	Email with C. Raynor re: Cayman research in connection with bad faith motion against HCLOM (0.4).	0.40	1,075.00	\$430.00
11/21/2024	HRW	H	Continue to review and edit bad faith motion against HCLOM and ancillary documents in preparation for filing (8.5).	8.50	1,075.00	\$9,137.50
11/21/2024	JAM	H	Substantial review/revisions to brief in support of Motion for Bad Faith finding ("BF Motion") and supporting documents (W&E list, proposed order, and Winograd declaration (7.4); tel c. w/ J. Seery re: BF Motion (0.2).	7.60	1,695.00	\$12,882.00

[REDACTED]	
Pachulski Stang Ziehl & Jones LLP	Page: 25
Highland Capital Management LP	Invoice 143602
Client 36027.00003	December 12, 2024

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/21/2024	JAM	H	Tel c. w/ A. Bates re: BF Motion (0.1); tel c. w/ H. Winograd re: BF Motion (0.2); tel c. w/ J. Seery re: BF Motion (0.1); tel c. w/ H. Winograd re: BF Motion (0.1); tel c. w/ J. Seery re: BF Motion (0.1); tel c. w/ H. Winograd re: BF Motion (0.1).	0.70	1,695.00	\$1,186.50
11/21/2024	JAM	H	Tel c. w/ J. Seery re: BF Motion (0.1); tel c. w/ Z. Annable re: BF Motion (0.1); numerous emails w/ H. Winograd, A. Bates, Z. Annable re: BF Motion and supporting documents (0.5).	0.70	1,695.00	\$1,186.50
11/21/2024	JAM	H	Numerous email w/ HCMLP team, H. Winograd, A. Bates re: BF Motion and supporting documentation (0.3).	0.30	1,695.00	\$508.50
11/21/2024	JMF	H	Review motion for sanction re HCLOM. [REDACTED]	0.40	1,395.00	\$558.00
11/25/2024	HRW	H	Call with J. Seery, J. Morris, J. Pomerantz re: [REDACTED] bad faith finding against HCLOM (0.5).	0.50	1,075.00	\$537.50
11/25/2024	HPW	H	Review emails from M. Aigen, J. Morris re: motion for bad faith finding against HCLOM (0.2).	0.20	1,075.00	\$215.00
11/25/2024	HRW	H	Review emails from J. Morris, Z. Annable re: notice of hearing on motion for bad faith finding against HCLOM (0.3).	0.30	1,075.00	\$322.50
11/25/2024	HRW	H	Review notice of hearing on motion for bad faith finding against HCLOM (0.2).	0.20	1,075.00	\$215.00
11/26/2024	GVD	H	Review and revise HCLOF settlement agreement and conference with J Seery re same	1.30	1,395.00	\$1,813.50
11/27/2024	GVD	H	Conference with client and Guernsey directors re HCLOF settlement and next steps	0.30	1,395.00	\$418.50
				216.20		\$297,542.00

[REDACTED]	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

EXHIBIT B

DEPOSITION EXPENSES

INVOICE

1 of 1

Everest Court Reporting LLC
 100 N. 18th St
 Suite 2001
 Philadelphia, PA 19103
 T: 215-341-3616

Invoice No.	Invoice Date	Job No.
50008	10/9/2024	33301
Job Date	Case No.	
9/24/2024	1934054SGJ11	
Case Name		
In re Highland Capital Management, L.P.		
Payment Terms		
Due upon receipt		

John Morris
 Pachulski Stang Ziehl & Jones LLP
 780 3rd Avenue
 Suite 34
 New York, NY 10017

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

Frank Waterhouse	224.00	Pages	@	9.900	2,217.60
Exhibit	273.00	Pages	@	0.350	95.55
Appearance fee	1.00		@	400.000	400.00
Roughdraft	224.00	Pages	@	1.950	436.80
Realtime Morris	224.00	Pages	@	1.950	436.80
Set Up / Break Down and 1st hour of video	1.00		@	295.000	295.00
Videographer	6.00	Hours	@	105.000	630.00
Videoconference	1.00		@	0.000	0.00
TOTAL DUE >>>					\$4,511.75
AFTER 11/8/2024 PAY					\$5,188.51

Client Matter No. : 36027.0003

*In Person Deposition: Dallas, Texas
 *1 Day Expedited transcript

Pay your invoice with a credit card here: <https://everestcourtrep.securepayments.cardpointe.com>

Tax ID: 82-4849405

Please detach bottom portion and return with payment.

John Morris
 Pachulski Stang Ziehl & Jones LLP
 780 3rd Avenue
 Suite 34
 New York, NY 10017

Job No. : 33301 BU ID : VIP
 Case No. : 1934054SGJ11
 Case Name : In re Highland Capital Management, L.P.
 Invoice No. : 50008 Invoice Date : 10/9/2024
Total Due : \$4,511.75
 AFTER 11/8/2024 PAY \$5,188.51

Remit To: **Everest Court Reporting**
12 Penns Trail
Newtown, PA 18940

PAYMENT WITH CREDIT CARD	
Cardholder's Name: _____	
Card Number: _____	
Exp. Date: _____	Phone#: _____
Billing Address: _____	
Zip: _____	Card Security Code: _____
Amount to Charge: _____	
Cardholder's Signature: _____	
Email: _____	

INVOICE

1 of 1



One Lincoln Center
110 West Fayette Street, Suite 750
Syracuse, New York 13202
315-422-4280

John Morris
Pachulski Stang Ziehl & Jones LLP
One Sansome St. #3430
San Francisco, CA 94104

Invoice No.	Invoice Date	Job No.
32909	11/5/2024	30439
Job Date	Case No.	
11/4/2024	CASE NO. 19-34054-SGJ11	
Case Name		
In Re: Highland Capital Management, L.P.		
Payment Terms		
Due upon receipt, 1.5% after 30 days		

James Dondero

Remote Legal - Deposition Hourly Fee (Original Transcript Included)	4.00	Hours	@	400.000	1,600.00
Remote Legal - Expedite Fee (3-6 days)	4.00	Hours	@	200.000	800.00

TOTAL DUE >>> \$2,400.00

Thank you for your valued business!

Customer agrees to pay all costs associated with the collection of a delinquent balance including but not limited to collection agency fees, reasonable attorney fees, and court costs.

Please note that a 3% processing fee is added to the balance on all credit card payments.

If you have questions, please email us at support@remotelegal.com. To make an online payment, please visit www.remotelegal.com and click on 'Make A Payment'.

Tax ID: 842527629

Please detach bottom portion and return with payment.

John Morris
Pachulski Stang Ziehl & Jones LLP
One Sansome St. #3430
San Francisco, CA 94104

Job No. : 30439 BU ID : RL
Case No. : CASE NO. 19-34054-SGJ11
Case Name : In Re: Highland Capital Management, L.P.
Invoice No. : 32909 Invoice Date : 11/5/2024
Total Due : \$2,400.00

Remit To: **Precision Reporters - Remote Legal**
PO Box 773010
Detroit, MI 48277-3010

PAYMENT WITH CREDIT CARD	
Cardholder's Name:	_____
Card Number:	_____
Exp. Date:	Phone#: _____
Billing Address:	_____
Zip:	Card Security Code: _____
Amount to Charge:	_____
Cardholder's Signature:	_____
Email:	_____



Veritext, LLC - Texas Region

Tel. 817-336-3042 Email: calendar-tx@veritext.com
 Fed. Tax ID: 20-3132569



Bill To: John Morris Esq
 Pachulski Stang Ziehl & Jones LLP
 780 Third Avenue
 34th Floor
 New York, NY, 10017

Invoice #: 7885005
 Invoice Date: 11/20/2024
 Balance Due: \$2,634.15

Case: In Re: Highland Capital Management, L.P. v. (1934054(sgj)) Proceeding Type: Depositions

Job #: 7022352 | Job Date: 11/13/2024 | Delivery: Expedited

Location: Dallas, TX

Billing Atty: John Morris Esq

Scheduling Atty: Deborah Deitsch-Perez | Stinson, LLP

Witness: James P. Seery , Jr.	Quantity	Price	Amount
Transcript Services - Certified Transcript	187.00	\$3.20	\$598.40
Transcript Services - Certified Transcript - Priority Request	187.00	\$1.60	\$299.20
Transcript - Supplemental Surcharges*	187.00	\$0.40	\$74.80
Rough Draft	187.00	\$2.25	\$420.75
Exhibits	35.00	\$0.60	\$21.00
Secure Hosting & Delivery of Veritext File Suite	1.00	\$60.00	\$60.00
Logistics & Processing	1.00	\$68.00	\$68.00
Smart Summary - Over 100 Transcript Pages	1.00	\$99.00	\$99.00

Witness: Timothy Joseph Cournoyer	Quantity	Price	Amount
Transcript Services - Certified Transcript	100.00	\$3.20	\$320.00
Transcript Services - Certified Transcript - Priority Request	100.00	\$1.60	\$160.00
Transcript - Supplemental Surcharges*	100.00	\$0.40	\$40.00
Rough Draft	100.00	\$2.25	\$225.00
Exhibits	10.00	\$0.60	\$6.00
Secure Hosting & Delivery of Veritext File Suite	1.00	\$60.00	\$60.00

Remit to:
 Veritext
 P.O. Box 71303
 Chicago IL 60694-1303
 Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
 A/C Name: Veritext
 Bank Name: BMO Harris Bank
 Account No: 4353454 ABA: 071000288
 Swift: HATRUS44

Invoice #: 7885005
 Invoice Date: 11/20/2024
 Balance Due: \$2,634.15

Pay by Credit Card: www.veritext.com

Veritext, LLC - Texas Region

Tel. 817-336-3042 Email: calendar-tx@veritext.com
 Fed. Tax ID: 20-3132569



Logistics & Processing	1.00	\$68.00	\$68.00
Smart Summary - Under 100 Transcript Pages	1.00	\$49.00	\$49.00
	Quantity	Price	Amount
Veritext Virtual Participants	1.00	\$65.00	\$65.00

Notes: *Supplemental Surcharges Include: Virtual Proceeding	Invoice Total:	\$2,634.15
	Payment:	\$0.00
	Credit:	\$0.00
	Interest:	\$0.00
	Balance Due:	\$2,634.15
<small>TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information</small>		

Remit to:
 Veritext
 P.O. Box 71303
 Chicago IL 60694-1303
 Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
 A/C Name: Veritext
 Bank Name: BMO Harris Bank
 Account No: 4353454 ABA: 071000288
 Swift: HATRUS44

Invoice #: 7885005
Invoice Date: 11/20/2024
Balance Due: \$2,634.15

[Pay by Credit Card: www.veritext.com](http://www.veritext.com)

EXHIBIT C

TRAVEL EXPENSES

Pachulski Stang Ziehl & Jones LLP
Highland Capital Management LP
Client 36027.00003

Page: 31
Invoice 142604
October 9, 2024

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

09/23/2024	AF	American Airlines, Tkt 7096212677, NY/Dallas, rt full refundable airfare 9/23 - 9/25 for hearing, JAM	663.48
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

09/25/2024	AF	Delta Airlines, tkt 7096212676, Dallas/JFK, rt refundable coach airfare, JAM	598.48
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[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

EXHIBIT D

SUMMARY OF FEES AND EXPENSES

SUMMARY OF ALL FEES AND EXPENSES INCURRED		
Fee Period	Invoice #	Fees
April 2023	132435	\$9,076.00
May 2023	132623	\$875.00
Nov 2023	136183	\$6,052.50
Dec 2023	137393	\$165.00
April 2024	138912	\$1,294.00
May 2024	139547	\$5,286.50
June 2024	140169	\$2,362.50
July 2024	141239	\$26,058.50
August 2024	142317	\$114,471.00
Sept 2024	142604	\$124,417.00
Oct 2024	143199	\$12,312.50
Nov 2024	143602	\$297,542.00
Total Fees		\$599,912.50
Total Expenses		\$10,807.86
TOTAL FEES AND EXPENSES		\$610,720.36