

John Y. Bonds, III  
State Bar I.D. No. 02589100  
John T. Wilson IV  
State Bar I.D. No. 24033344  
Bryan C. Assink  
State Bar I.D. No. 24089009  
BONDS ELLIS EPPICH SCHAFFER JONES LLP  
420 Throckmorton Street, Suite 1000  
Fort Worth, Texas 76102  
(817) 405-6900 telephone  
(817) 405-6902 facsimile

ATTORNEYS FOR DEFENDANT JAMES DONDERO

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

**In re:** § **Case No. 19-34054**  
§  
**HIGHLAND CAPITAL MANAGEMENT, L.P.** § **Chapter 11**  
§  
**Debtor.** §

---

**HIGHLAND CAPITAL MANAGEMENT, L.P.,** §  
§  
**Plaintiff.** §  
§  
v. §  
§ **Adversary No. 20-03190**  
§  
**JAMES D. DONDERO,** §  
§  
**Defendant.** §

**JAMES DONDERO’S WITNESS AND EXHIBIT LIST**

Defendant James Dondero (“Dondero”) hereby files this Witness and Exhibit List with respect to the hearing on *Defendant’s Emergency Motion to Stay Proceedings Pending Resolution of Defendant’s Petition for Writ of Mandamus or, Alternatively, Motion to Continue Trial Setting* [Docket No. 154] set for hearing on May 10, 2021 at 1:30 p.m. (the “Hearing”) in the above-styled adversary proceeding (the “Adversary Proceeding”).



**A. Documents that Dondero may use as exhibits:**

<b>Dondero Exhibit No.</b>	<b>Description</b>	<b>Offered</b>	<b>Objection</b>	<b>Admitted by Agreement</b>	<b>Admitted</b>
1.	Dondero's Motion to Stay or to Continue Trial [Docket No. 154]				
2.	Dondero's Petition for Writ of Mandamus [Docket No. 154-2]				
3.	Letter from Fifth Circuit Clerk to counsel for the Debtor requiring response to Mandamus [Docket No. 154-3]				
	Any document or pleading filed in the above-captioned bankruptcy case or adversary proceeding				
	Any exhibit necessary for impeachment or rebuttal purposes				
	Any and all documents identified or offered by any other party				

Dondero reserves the right to supplement this Exhibit List should he determine that any other document may be helpful to the trier of fact, whether in his case in chief or rebuttal.

**B. Witnesses that Dondero may call to testify:**

1. Any witnesses identified or called by any other party; and
2. Any witness necessary for rebuttal.

Dondero reserves the right to supplement this Witness List should he determine that any other witness may be helpful to the trier of fact, whether in his case in chief or rebuttal.

Dated: May 10, 2021

Respectfully submitted,

/s/ Bryan C. Assink

John Y. Bonds, III

State Bar I.D. No. 02589100

John T. Wilson, IV

State Bar I.D. No. 24033344

Bryan C. Assink

State Bar I.D. No. 24089009

BONDS ELLIS EPPICH SCHAFFER JONES LLP

420 Throckmorton Street, Suite 1000

Fort Worth, Texas 76102

(817) 405-6900 telephone

(817) 405-6902 facsimile

Email: john@bondsellis.com

Email: john.wilson@bondsellis.com

Email: bryan.assink@bondsellis.com

**ATTORNEYS FOR DEFENDANT JAMES DONDERO**

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that, on May 10, 2021, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all parties requesting or consenting to such service in this case.

/s/ Bryan C. Assink

Bryan C. Assink