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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 OBJECTIONS TO THE DEBTOR’S TRIAL EXHIBITS

Defendant James Dondero (“Dondero”) hereby files these objections to the Debtor’s proposed exhibits in connection with trial on its request for permanent injunctive relief in this adversary proceeding. Dondero respectfully makes the following objections to the Debtor’s proposed exhibits identified on *Debtor’s Witness and Exhibit List with Respect to Trial to be Held During Week of May 17, 2021* [Adv. Dkt. 150].



Debtor's Exhibit Number	Dondero's objections to Debtor's Exhibit
2.	Hearsay, relevance
3.	Hearsay, lack of foundation, lack of authentication, relevance
4.	Hearsay, lack of foundation, lack of authentication, relevance
5.	Hearsay, lack of foundation, lack of authentication
8.	Hearsay, lack of foundation, lack of authentication, relevance
9.	Hearsay, lack of foundation, lack of authentication, relevance
12.	Relevance
13.	Hearsay, lack of foundation, lack of authentication, relevance
14.	Relevance
15.	Relevance
17.	Hearsay, lack of foundation, lack of authentication, relevance
18.	Hearsay, lack of foundation, lack of authentication, relevance
19.	Hearsay, lack of foundation, lack of authentication, relevance
20.	Hearsay, lack of foundation, lack of authentication, relevance
21.	Hearsay, lack of foundation, lack of authentication, relevance
23.	Hearsay, lack of foundation, lack of authentication, relevance
24.	Hearsay, lack of foundation, lack of authentication, relevance
25.	Hearsay, lack of foundation, lack of authentication, relevance
26.	Hearsay, lack of foundation, lack of authentication, relevance
28.	Hearsay, lack of foundation, lack of authentication, relevance
29.	Hearsay, lack of foundation, lack of authentication, relevance
30.	Hearsay, lack of foundation, lack of authentication, relevance
31.	Hearsay, lack of foundation, lack of authentication, relevance

32.	Hearsay, lack of foundation, lack of authentication, relevance
33.	Hearsay, lack of foundation, lack of authentication, relevance
34.	Hearsay, lack of foundation, lack of authentication, relevance
35.	Hearsay, lack of foundation, lack of authentication, relevance
36.	Hearsay, lack of foundation, lack of authentication, relevance
37.	Hearsay, lack of foundation, lack of authentication, relevance
38.	Hearsay, lack of foundation, lack of authentication, relevance
39.	Hearsay, lack of foundation, lack of authentication, relevance
40.	Hearsay, lack of foundation, lack of authentication, relevance
41.	Hearsay, lack of foundation, lack of authentication, relevance
42.	Hearsay, lack of foundation, lack of authentication, relevance
43.	Hearsay, lack of foundation, lack of authentication, relevance
44.	Relevance
45.	Hearsay, lack of foundation, lack of authentication, relevance
46.	Hearsay, lack of foundation, lack of authentication, relevance
47.	Hearsay, lack of foundation, lack of authentication, relevance
48.	Hearsay, lack of foundation, lack of authentication, relevance
49.	Hearsay, lack of foundation, lack of authentication, relevance
50.	Hearsay, lack of foundation, lack of authentication, relevance
51.	Hearsay, lack of foundation, lack of authentication, relevance
52.	Hearsay, lack of foundation, lack of authentication, relevance
53.	Hearsay, lack of foundation, lack of authentication, relevance
54.	Hearsay, lack of foundation, lack of authentication, relevance
55.	Hearsay, lack of foundation, lack of authentication, relevance

56.	Hearsay, lack of foundation, lack of authentication, relevance
57.	Hearsay, lack of foundation, lack of authentication, relevance
58.	Hearsay, lack of foundation, lack of authentication, lack of personal knowledge, relevance
59.	Hearsay, lack of foundation, lack of authentication, lack of personal knowledge, relevance
60.	Hearsay, lack of foundation, lack of authentication, relevance
61.	Hearsay, lack of foundation, lack of authentication, relevance
62.	Hearsay, lack of foundation, lack of authentication, lack of personal knowledge, relevance
63.	Hearsay, lack of foundation, lack of authentication, lack of personal knowledge, relevance
64.	Hearsay, lack of foundation, lack of authentication, lack of personal knowledge, relevance
65.	Hearsay, lack of foundation, lack of authentication, relevance

Dondero reserves the right to amend or supplement these objections and to object to the above-identified exhibits on any additional grounds.

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Dated: May 10, 2021

Respectfully submitted,

/s/ Bryan C. Assink

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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