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Attorneys for Pension Benefit Guaranty Corporation

**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 The last four digits of the Reorganized Debtor's taxpayer identification number are 6725. The headquarters and service address for the Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.



**STIPULATION AND AGREED ORDER
AUTHORIZING WITHDRAWAL OF PROOFS OF CLAIM 49, 50, AND 51 FILED BY
THE PENSION BENEFIT GUARANTY CORPORATION**

This *Stipulation and Agreed Order Authorizing Withdrawal of Proofs of Claim 49, 50, and 51 Filed by the Pension Benefit Guaranty Corporation* (the “Stipulation”) is entered into between Highland Capital Management, L.P., the reorganized debtor (“HCMLP”), and the Pension Benefit Guaranty Corporation (“PBGC”).

RECITALS

WHEREAS, on March 16, 2020, PBGC filed proof of claim number 49 (“Claim 49”), proof of claim number 50 (“Claim 50”), and proof of claim number 51 (“Claim 51” and, together with Claim 49 and Claim 50, the “PBGC Claims”) relating to certain asserted potential liabilities in connection with the Highland Capital Management L.P. Plan and Trust (the “Pension Plan”).

WHEREAS, on February 22, 2021, this Court entered the *Order (i) Confirming the Fifth Amended Plan of Reorganization (as Modified) and (ii) Granting Related Relief* [Docket No. 1943], which confirmed the *Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified)* [Docket No. 1808] (the “Plan”).²

WHEREAS, the effective date of the Plan occurred on August 11, 2021 (the “Effective Date”), and HCMLP is the reorganized debtor pursuant to the Plan [Docket No. 2700].

WHEREAS, PBGC now desires to withdraw the PBGC Claims with prejudice.

STIPULATION

Now, therefore, HCMLP and PBGC agree and stipulate as follows:

1. Claim 49 is hereby withdrawn with prejudice.
2. Claim 50 is hereby withdrawn with prejudice.

² The confirmed Plan included certain amendments filed on February 1, 2021. *See Debtor’s Notice of Filing of Plan Supplement to the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified)*, Docket No. 1875, Exh. B.

3. Claim 51 is hereby withdrawn with prejudice.

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IT IS SO STIPULATED:

Dated: September 20, 2021.

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