Thomas C. Scannell (TX 24070559)

Katherine R. Catanese

FOLEY & LARDNER LLP

2021 McKinney Avenue, Suite 1600

Dallas, TX 75201

Telephone: (214) 999-3000 Facsimile: (214) 999-4667 tscannell@foley.com kcatanese@foley.com

COUNSEL FOR SENTINEL REINSURANCE, LTD.

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

| IN RE:  | §           | CHAPTER 11              |
|---|-------------|-------------------------|
| HIGHLAND CAPITAL MANAGEMENT, LP   | §<br>§<br>8 | CASE NO: 19-34054-sgj11 |
| DEBTOR.   | §           | (Joint Administration)  |
| UBS SECURITIES LLC AND UBS LONDON BRANCH AG, Plaintiff, v. HIGHLAND CAPITAL MANAGEMENT, L.P. Defendant. | w w w w w w | ADV. PROC. NO. 21-03020 |

## WITNESS AND EXHIBIT LIST

Sentinel Reinsurance, Ltd. ("Sentinel") hereby files its *Witness and Exhibit List* for the hearing scheduled for October 27, 2021, at 1:30 pm (CST) in the above-captioned adversary proceeding.

1. Sentinel may offer any one or more of the following exhibits at the hearing:

| Exhibit | Description  | M<br>A<br>R<br>K<br>E<br>D | O<br>F<br>F<br>E<br>R<br>E<br>D | O<br>B<br>J<br>E<br>C | A<br>D<br>M<br>I<br>T | Disposition<br>After Hearing |
|---------|--|----------------------------|---------------------------------|-----------------------|-----------------------|------------------------------|
| A       | Management and Administrative Services Agreement dated October 1, 2013   |                            |                                 |                       |                       |                              |
| В       | Letter from UBS Counsel to Sentinel dated May 14, 2021   |                            |                                 |                       |                       |                              |
| С       | Subpoena served upon Beecher in the Northern District of Texas, Bankruptcy Court dated June 29, 2021 (ECF No. 106-2)   |                            |                                 |                       |                       |                              |
| D       | Letter from Brown & Brown (Beecher Parent) regarding Subpoena dated July 13, 2021  |                            |                                 |                       |                       |                              |
| Е       | Letter from UBS Counsel to Sentinel dated July 21, 2021  |                            |                                 |                       |                       |                              |
| F       | Information Subpoena served upon Beecher in<br>New York County Supreme Court dated July 21,<br>2021  |                            |                                 |                       |                       |                              |
| G       | Letter from Sentinel's Cayman Islands Counsel to UBS Counsel dated July 23, 2021   |                            |                                 |                       |                       |                              |
| Н       | Letter from Sentinel Counsel to UBS Counsel dated August 18, 2021  |                            |                                 |                       |                       |                              |
| I       | E-mail thread between Sentinel Counsel to UBS Counsel dated August 20, 2021  |                            |                                 |                       |                       |                              |
| J       | Subpoena served upon Beecher in New York<br>County Supreme Court dated August 24, 2021   |                            |                                 |                       |                       |                              |
| K       | Redacted Email from the Honorable Judge<br>Melissa A. Crane of New York Supreme Court of<br>New York County, Commercial Division dated<br>September 16, 2021 |                            |                                 |                       |                       |                              |

- 2. Sentinel may call any of the following as a witness at the hearing:
  - A. Casey McDonald, independent director of Sentinel;
  - B. Any witness called or designated by any other party in interest; and

C. Any witness necessary to rebut the testimony of witnesses called or designated by any other party.

Sentinel reserves the right to supplement or amend this *Witness and Exhibit List* at any time prior to the hearing.

DATED: October 22, 2021 Respectfully submitted by:

/s/ Thomas C. Scannell

Thomas C. Scannell (TX 24070559)

Katherine R. Catanese

**FOLEY & LARDNER LLP** 

2021 McKinney Avenue, Suite 1600

Dallas, TX 75201

Telephone: (214) 999-3000 Facsimile: (214) 999-4667 tscannell@foley.com kcatanese@foley.com

**COUNSEL FOR SENTINEL** 

## **CERTIFICATE OF SERVICE**

I hereby certify that, on October 22, 2021, a true and correct copy of the foregoing document was served electronically by the Court's PACER system.

/s/ Thomas C. Scannell
Thomas C. Scannell

3