

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

<b>IN RE:</b>	§	
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<b>HIGHLAND CAPITAL MANAGEMENT, L.P.,</b>	§	<b>Case No. 19-34054</b>
	§	
<b>Debtor.</b>	§	<b>Chapter 11</b>

**STIPULATION AND AGREED ORDER AUTHORIZING WITHDRAWAL  
OF PROOFS OF CLAIM NOS. 141, 142, AND 145**

This *Stipulation and Agreed Order Authorizing Withdrawal of Proofs of Claim Nos. 141, 142, and 145* (this “Stipulation”) is entered into between Marc S. Kirschner (the “Litigation Trustee”), as Litigation Trustee of the Litigation Sub-Trust established pursuant to the Fifth Amended Plan of Reorganization of Highland Capital Management L.P. (“HCMLP”) [Docket No. 1808] and James Dondero (“Claimant Dondero”).

**RECITALS**

**WHEREAS**, on April 8, 2020, Claimant Dondero filed proof of claim number 141 (“Claim 141”);

**WHEREAS**, on April 8, 2020, Claimant Dondero filed proof of claim number 142 (“Claim 142”);

**WHEREAS**, on April 8, 2020, Claimant Dondero filed proof of claim number 145 (“Claim 145”);

**WHEREAS**, Claimant Dondero now desires to withdraw Claims 141, 142, and 145 with prejudice to refile such proofs of claim.



**STIPULATION**

**NOW, THEREFORE, IN CONSIDERATION OF THE FOREGOING, THE PARTIES HEREBY AGREE AND STIPULATE AS FOLLOWS:**

1. Claims 141, 142, and 145 filed by Claimant Dondero, are hereby withdrawn with prejudice to refileing such proofs of claim.
2. This Stipulation is and will be binding on Claimant Dondero his predecessors, successors, transferees, and assigns.
3. The Bankruptcy Court for the Northern District of Texas, Dallas Division, shall have and retain jurisdiction over all disputes arising out of or otherwise concerning the interpretation and enforcement of this Stipulation.
4. To the extent applicable, the official claims register in the HCMLP bankruptcy case will be modified in accordance with this Stipulation

IT IS SO STIPULATED.

Dated: January 21, 2022

CONSENTED AND AGREED TO BY:

/s/ Alexandre J. Tschumi  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN RE:**

**HIGHLAND CAPITAL MANAGEMENT,  
L.P.,**

**Debtor.**

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**Case No. 19-34054**

**Chapter 11**

**ORDER APPROVING STIPULATION AND AGREED ORDER AUTHORIZING  
WITHDRAWAL OF PROOFS OF CLAIM NOS. 141, 142 AND 145**

Upon consideration of the *Stipulation and Agreed Order Authorizing Withdrawal of Proofs of Claim Nos. 141, 142, and 145* filed (the “Stipulation”) between Marc S. Kirschner (the “Litigation Trustee”), as Litigation Trustee of the Litigation Sub-Trust established pursuant to the Fifth Amended Plan of Reorganization of Highland Capital Management L.P. (“HCMLP”) and James Dondero (“Claimant Dondero”) in the above-captioned case, it is **HEREBY ORDERED**

**THAT:**

1. The Stipulation, a copy of which is attached hereto as **Exhibit A**, is approved.
2. The withdrawal of Proofs of Claim Nos. 141, 142, and 145 with prejudice to refileing such proofs of claim is approved.

3. This Order and the Stipulation are and will be binding on Claimant and Claimant's predecessors, successors, transferees and assigns.

4. To the extent applicable, the official claims register in the HCMLP bankruptcy case will be modified in accordance with this Order.

5. This Court shall have and retain jurisdiction over all disputes arising out of or otherwise concerning the interpretation and enforcement of this Order and the Stipulation.

### END OF ORDER ###

**EXHIBIT A**

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

**IN RE:**

**HIGHLAND CAPITAL MANAGEMENT,  
L.P.,**

**Debtor.**

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**Case No. 19-34054**

**Chapter 11**

**STIPULATION AND AGREED ORDER AUTHORIZING WITHDRAWAL  
OF PROOFS OF CLAIM NOS. 141, 142, AND 145**

This *Stipulation and Agreed Order Authorizing Withdrawal of Proofs of Claim Nos. 141, 142, and 145* (this “Stipulation”) is entered into between Marc S. Kirschner (the “Litigation Trustee”), as Litigation Trustee of the Litigation Sub-Trust established pursuant to the Fifth Amended Plan of Reorganization of Highland Capital Management L.P. (“HCMLP”) [Docket No. 1808] and James Dondero (“Claimant Dondero”).

**RECITALS**

**WHEREAS**, on April 8, 2020, Claimant Dondero filed proof of claim number 141 (“Claim 141”);

**WHEREAS**, on April 8, 2020, Claimant Dondero filed proof of claim number 142 (“Claim 142”);

**WHEREAS**, on April 8, 2020, Claimant Dondero filed proof of claim number 145 (“Claim 145”);

**WHEREAS**, Claimant Dondero now desires to withdraw Claims 141, 142, and 145 with prejudice to refile such proofs of claim.

**STIPULATION**

**NOW, THEREFORE, IN CONSIDERATION OF THE FOREGOING, THE PARTIES HEREBY AGREE AND STIPULATE AS FOLLOWS:**

1. Claims 141, 142, and 145 filed by Claimant Dondero, are hereby withdrawn with prejudice to refileing such proofs of claim.
2. This Stipulation is and will be binding on Claimant Dondero his predecessors, successors, transferees, and assigns.
3. The Bankruptcy Court for the Northern District of Texas, Dallas Division, shall have and retain jurisdiction over all disputes arising out of or otherwise concerning the interpretation and enforcement of this Stipulation.
4. To the extent applicable, the official claims register in the HCMLP bankruptcy case will be modified in accordance with this Stipulation

IT IS SO STIPULATED.

Dated: January 21, 2022

CONSENTED AND AGREED TO BY:

/s/ Alexandre J. Tschumi  
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