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*Counsel for UBS Securities LLC and UBS  
AG London Branch*

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

In re	§	Chapter 11
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P., <sup>1</sup>	§	Case No. 19-34054-sgj11
	§	
Debtor.	§	
-----		
UBS SECURITIES LLC AND UBS AG	§	Adversary Proceeding
LONDON BRANCH,	§	
	§	No. 21-03020
Plaintiffs,	§	
	§	
vs.	§	
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.,	§	
	§	
Defendant.	§	

<sup>1</sup> The Reorganized Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.



**UBS’S SECOND AMENDED WITNESS AND EXHIBIT LIST  
FOR AUGUST 8, 2022 HEARING**

UBS Securities LLC and UBS AG London Branch (together, “UBS”), by and through their undersigned counsel, submit the following witness and exhibit list for the hearing set for 9:30 am Central Time on August 8, 2022, in connection with *Highland Capital Management, L.P.’s Motion to Withdraw its Answer and Consent to Judgment for Permanent Injunctive Relief* [Adv. Dkt. No. 169].

**A. WITNESSES THAT UBS MAY CALL TO TESTIFY:**

1. James Seery, Jr.;
2. Any witness designated or called by any other party; and
3. Any witness necessary for impeachment or rebuttal.

**B. DOCUMENTS UBS MAY USE AS EXHIBITS:**

Ex. No.	Exhibit	Offered	Admitted
1	Legal Liability Insurance Policy between Sentinel Reinsurance, Ltd., Highland CDO Opportunity Master Fund, L.P., Highland CDO Holding Company, and Highland Special Opportunities Holdings Company, effective August 1, 2017, as produced by Highland at UBSPROD1973053		
2	Purchase Agreement between Sentinel Reinsurance, Ltd., Highland CDO Opportunity Master Fund, L.P., Highland CDO Holding Company, and Highland Special Opportunities Holdings Company, dated Aug. 7, 2017		
3	Email from Shawn Raver to Rick Swadley, dated September 12, 2018, attaching a June 30, 2018 memorandum entitled, “Tax Consequences of Sentinel Acquisition of HFP/CDO Opportunity Assets,” as produced by Highland at UBSPROD4837351		
4	Judgment on Phase I Trial, entered by the N.Y. Court on February 10, 2020 [NY Dkt. No. 646]		

Ex. No.	Exhibit	Offered	Admitted
5	Decision and Order on Summary Judgment Motions by the N.Y. Court, filed March 24, 2017 [NY Dkt. No. 411]		
6	Email from Beecher to JP Sevilla on June 8, 2017, with subject "ATE Actuary," as produced by Beecher at BC SEN0000744847		
7	Presentation titled "Settlement Analysis UBS v. H," as produced by Highland at HCMUBS005251		
8	Sentinel structure organizational chart, notarized by Sarah Bell on January 9, 2018, as produced by Beecher at BC SEN0000133744		
9	Email from Katie Irving on August 16, 2017, with subject "Financials" and attaching Sentinel's unaudited financial statements for year-end 2016, as produced by Highland at HCMUBS001066		
10	Email from Beecher to JP Sevilla on August 8, 2017, with subject "Draft ATE policy," as produced by Beecher at BC SEN0000745902		
11	Email attaching CIMA's Final Onsite Inspection Reports to Sentinel, as produced by Beecher at BC SEN0000078777		
12	Email from Beecher to JP Sevilla and Matt DiOrio on June 6, 2018, with subject "Sentinel," as produced by Beecher at BC SEN0000668753		
13	[Omitted]		
14	Copy of the Legal Liability Insurance Policy with Endorsements Nos. 1 & 2, as produced by Matt DiOrio at MD_000010		
15	Asset Transfer Agreement, dated as of December 31, 2019, as produced by Highland at UBSPROD020567		
16	Emails between Isaac Leventon, Jim Seery, and Scott Ellington on August 5, 2020, with subject "UBS		

Ex. No.	Exhibit	Offered	Admitted
	Supplemental Information Request,” as produced by Highland at UBSPROD495884		
17	Email from Scott Ellington to Jim Seery and others on August 15, 2020, with subject “UB Diligence Requests: Highland Credit Opportunities CDO Ltd.,” as produced by Highland at UBSPROD1611114		
18	Email from Matt DiOrion on January 28, 2021, with subject “HCM - Greenbriar Pref Shares CDO Fund,” as produced by Highland at UBSPROD1660781		
19	Internal Beecher email on February 6, 2020, attaching Expense Reports for Scott Ellington, as produced by Beecher at BC SEN0000727319		
20	Email between Beecher employees on December 20, 2019, with subject “Ellington - Request Reimbursement,” as produced by Beecher at BC SEN0000663342		
21	CIBC Wire Transfer Debit Advice receipt for Sentinel’s payment of \$4,480,000.00, as produced by Beecher at BC SEN0000123498		
22	CIBC Wire Transfer Debit Advice receipt for Sentinel’s payment of \$1,920,000.00, as produced by Beecher at BC SEN0000004242		
23	Email attaching a letter from Sentinel to CIMA, dated April 26, 2021, with subject “Sentinel Reinsurance, Ltd. (“Sentinel”; License #642423) Notification – Dividend Payment,” as produced by Beecher at BC SEN0000083961		
24	[Omitted]		
25	Transcript of the Deposition of James Dondero (Part 1), dated 5/10/2021		
26	Transcript of the Deposition of James Dondero (Part 2), dated 5/12/2021		

Ex. No.	Exhibit	Offered	Admitted
27	Transcript of the Deposition of Jean Paul Sevilla, dated 7/21/2021		
28	Transcript of the Deposition of Isaac Leventon, dated 7/22/2021 (with redaction)		
29	Transcript of the Deposition of Matthew T. DiOrio, dated 7/23/2021 (with redaction)		
30	Transcript of the Deposition of Scott Ellington, dated 7/29/2021 (with redaction)		
31	Transcript of the Deposition of the 30(b)(6) Representative of Beecher Carlson (Thomas Adamczak), dated 4/12/2022		
32	Transcript of the Deposition of Clifford Stoops, dated April 27, 2021		
33	Transcript of the Deposition of Jeremy Ringheimer, dated April 30, 2021		
34	Highland's Second Amended Responses and Objections to UBS's Interrogatories, dated November 30, 2021		
35	Highland's Amended Responses and Objections to UBS's Requests for Admission, dated September 3, 2021		
36	[Omitted]		
37	Original Complaint for Injunctive Relief [Adv. Dkt. No. 156]		
38	Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction [Adv. Dkt. No. 157]		
39	Appendix of Exhibits to Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction [Adv. Dkt. No. 158]		
40	Order Granting Plaintiffs' Motion for a Temporary Restraining Order, as entered on April 9, 2021 [Adv. Dkt. No. 21]		

Ex. No.	Exhibit	Offered	Admitted
41	Highland Capital Management, L.P.'s Motion to Withdraw its Answer and Consent to Judgment for Permanent Injunctive Relief [Adv. Dkt. No. 169]		
42	Declaration of Mr. James P. Seery, Jr. in Support of Highland Capital Management, L.P.'s Motion to Withdraw its Answer and Consent to Judgment for Permanent Injunctive Relief [Adv. Dkt. No. 170]		
43	Decision, Order, and Judgment after Phase II Damages Inquest, entered by the N.Y. Court on July 29, 2022 [NY Dkt. No. 777]		
44	Letter from Highland Financial Partners, L.P to Investors, dated January 27, 2009, as produced by Highland at UBSPROD5028123		
45	Letter from Highland to Highland CDO Opportunity Fund Investors, dated February 4, 2009, as produced by Highland at UBSPROD5052903		
46	Email from Scott Ellington to Isaac Leventon and JP Sevilla on December 1, 2017, with subject "Fwd: PRIVILEGED FW: Multi Strat Cash Projections" attaching Multi-Strat cash projection and distribution allocation, as produced by Highland at UBSPROD020562		
47	Unanimous Written Resolutions of the Board of Directors of Sentinel, dated April 23, 2020, as produced by Beecher at native SEN0000015082		
48	Unanimous Written Resolutions of the Board of Directors of Sentinel, dated January 11, 2021, as produced by Beecher at native SEN0000031379		
49	Email from Beecher to Matt DiOrio, among others, on June 24, 2021, with subject "Sentinel Expenses for Approval," as produced by Beecher at BC SEN0000074289		
50	Transcript of the Deposition of James Seery, dated August 5, 2022		

Ex. No.	Exhibit	Offered	Admitted
51	Transcript of the Deposition of Katie Lucas Irving, dated November 15, 2021		
52	Expert Report of Louis G. Dudney, dated March 8, 2013, as filed under seal as Exhibit 24 to the <i>Appendix to Redeemer Committee of the Highland Crusader Fund and the Crusader Funds' Brief in Support of Motion for Partial Summary Judgment and Joinder in the Debtor's Motion for Partial Summary Judgment on Proof of Claim Nos. 190 and 191 of UBS AG, London Branch and UBS Securities LLC</i> [Dkt. No. 1211]		
53	HFP Termination, Settlement and Release Agreement, dated March 20, 2009, as filed under seal as Exhibit 25 to the <i>Appendix to Redeemer Committee of the Highland Crusader Fund and the Crusader Funds' Brief in Support of Motion for Partial Summary Judgment and Joinder in the Debtor's Motion for Partial Summary Judgment on Proof of Claim Nos. 190 and 191 of UBS AG, London Branch and UBS Securities LLC</i> [Dkt. No. 1211]		
54	All exhibits identified by or offered by any other party at the hearing		
55	All exhibits necessary for impeachment and/or rebuttal purposes		
56	Any pleadings, reports, or other documents entered or filed in the chapter 11 case or related adversary proceedings, including any exhibits thereto		
57	UBS's First Request for Production of Documents to Debtor Highland Capital Management, L.P., as served on Highland by UBS on September 28, 2020		

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DATED this 8<sup>th</sup> day of August 2022.

Respectfully submitted,

**LATHAM & WATKINS LLP**

By /s/ Kathryn George

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*Counsel for UBS Securities LLC and UBS  
AG London Branch*



**CERTIFICATE OF SERVICE**

I, Candice Carson, certify that *UBS's Second Amended Witness and Exhibit List For August 8, 2022 Hearing* was filed electronically through the Court's ECF system, which provides notice to all parties of interest.

Dated: August 8, 2022.

/s/ Candice Carson

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

-----X  
*In re* :  
: Chapter 11  
HIGHLAND CAPITAL MANAGEMENT, L.P.,<sup>1</sup> :  
: Case No. 19-34054-sgj11  
Debtor. :  
-----X

**UBS’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
DEBTOR HIGHLAND CAPITAL MANAGEMENT, L.P.**

PLEASE TAKE NOTICE THAT pursuant to Rules 7026 and 7034 of the Federal Rules of Bankruptcy Procedure and Rules 26(b) and 34 of the Federal Rules of Civil Procedure incorporated therein, and in connection with (i) the *Debtor’s Objection to Proofs of Claim 190 and 191 of UBS Securities LLC and UBS AG, London Branch* [Docket No. 928] and resulting October 6, 2020 status conference and (ii) the Debtor’s Amended Plan and Amended Disclosure Statement [Docket Nos. 1079, 1080] and corresponding October 22, 2020 hearing in the above captioned chapter 11 case, UBS Securities LLC and UBS AG, London Branch (together “UBS”), by their undersigned counsel, hereby request that the Debtor produce documents and materials responsive to these requests (the “Requests”) as soon as possible, but no later than October 8, 2020, which is ten days from the date of service, to the law offices of Latham & Watkins, 555 11<sup>th</sup> Street NW, Suite 1000, Washington, DC 20004, Attention: Andrew Clubok and Sarah Tomkowiak, by delivery through electronic means to the email addresses [andrew.clubok@lw.com](mailto:andrew.clubok@lw.com) and [sarah.tomkowiak@lw.com](mailto:sarah.tomkowiak@lw.com).

<sup>1</sup> The Debtor’s last four digits of its taxpayer identification number are 6725. The headquarters and service address for the Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.



## I. DEFINITIONS

The terms utilized herein shall have the meanings specified below. Each defined term shall have the meaning ascribed to it regardless of whether the term is capitalized. Any term referencing any business, legal, or governmental entity or association shall be deemed a reference to any and all of its predecessors, successors, affiliates, and subsidiaries, as well as any and all of its past or present officers, directors, partners, members, managers, employees, representatives, and agents.

Defined terms include the following:

1. “Analyses and Models” means any Document relating to the Debtor’s past, present, or future financial condition, prospects, or results, including without limitation: (a) Documents that analyze, constitute, or support the Debtor’s financial statements; (b) budgets, forecasts, projections, outlooks, and strategic or other plans, including short-term or multi-year projections, supporting models, and assumptions; (c) capital investment analyses or plans; (d) financial models; (e) operating results; (f) operating statistics; (g) acquisitions, divestments, or ventures; (h) any solvency analyses, valuations, appraisals, fairness opinions, or assessments; (i) operating statistics and financial information prepared in connection with potential or completed financings; and (j) any and all reports or presentations generated in, or outside, the ordinary course of business.
2. “CDO Fund” means Highland CDO Opportunity Master Fund, L.P.
3. “Committee” means the official committee of unsecured creditors appointed in the Debtor’s bankruptcy proceeding.
4. “Communications” means the transmittal of information in all forms, including, without limitation, through meetings, in-person or telephone conversations, telegrams, facsimile or electronic mail transmissions, correspondence, letters, reports,

memoranda, formal or informal statements, press releases, newspaper stories, records of conversations or messages, and similar modes. References to Communications with business entities shall be deemed to include all officers, directors, employees, personnel, agents, attorneys, accountants, consultants, independent contractors, or other representatives of such entities.

5. “Debtor,” “You,” or “Your” means Highland Capital Management, L.P. and any of its attorneys, representatives, consultants, advisors, or anyone acting on the Debtor’s behalf.
6. “Documents” means all documents and materials, whether written, graphic, or otherwise, including all originals, identical or non-identical copies, drafts, working papers, reproductions, or recordings of any kind, or other data compilations from which information can be obtained or translated into reasonably usable form. Documents shall be construed broadly to encompass, without limitation, Analyses and Records, Communications, notations made regarding any Communications, books, records, ledgers, journals, notebooks, calendars, minutes, agendas, notices, presentations, credit memoranda, promissory notes, sales slips, checks or cancelled checks, agreements, contracts, licenses, opinions, projections, spreadsheets, summaries, sworn or unsworn statements, recordings, drawings, photographs, computer data, or similar items, regardless of the form maintained.
7. “HFP” means Highland Financial Partners, L.P.
8. “SOHC” means Highland Special Opportunities Holding Company.

## **II. INSTRUCTIONS**

1. The terms used in the Requests are to be given their most expansive and inclusive interpretation unless otherwise expressly limited in a Request. This includes, without limitation, the following:
  - a. construing “and” and “or” in the disjunctive or conjunctive as necessary to make a request more inclusive;
  - b. construing the singular form of a word to include the plural and vice versa;
  - c. construing the term “among” to mean between or among;
  - d. construing the term “any” to mean any, all, each, and every;
  - e. construing the masculine, feminine, or neutral pronouns to include other genders; and
  - f. construing the present tense of a verb to include its past tense and vice versa.
2. In response to the Requests, produce all Documents in Your actual or constructive possession, custody, or control, or in the actual or constructive possession, custody, or control of any of Your representatives, agents, employees, accountants, or attorneys.
3. These requests are continuing in nature. To the extent Your responses may be enlarged, diminished, or otherwise modified by information acquired after Your initial responses, You are required, to the fullest extent under applicable laws and rules, to promptly supplement Your initial responses in writing to reflect such changes and to produce any additional Documents.
4. If any Documents were formerly in Your possession, custody, or control and have been lost, destroyed, or otherwise disposed of, then furnish a list that identifies all such Documents and states for each such Document: (a) the nature (*e.g.*, letter, memorandum, etc.), size, and subject matter of the Documents; (b) the persons who

prepared or authored the Documents, and, if applicable, the persons to whom the Documents were sent; (c) the date when the Documents were prepared or transmitted; and (d) the date when the Documents were lost, destroyed, or otherwise disposed of, the reasons for such destruction or disposition, and the persons requesting and performing the destruction or disposition.

5. For each Document withheld on the ground of any privilege or immunity, furnish a list that identifies each such Document and states for each such Document: (a) the nature (*e.g.*, letter, memorandum, etc.), size, and subject matter of the Documents; (b) the persons who prepared or authored the Documents, and, if applicable, the persons to whom the Documents were sent; (c) each person having a copy of the Documents and each person to whom a copy was sent or whom received a copy; (d) the date on which the Documents were prepared or transmitted; and (e) the nature of and basis for the privilege claimed.
6. If any portion of a Document is responsive to these Requests, produce the entirety of the Document. Likewise, if only part of a responsive Document is protected by privilege or immunity, produce the Document with only the privileged matter redacted.
7. Produce all Documents as they are kept in the ordinary course of business, and when applicable, in the order they are found in a person's files. If Documents are kept in a file with a file label, produce a copy of that label together with the Documents, Communications, or other materials in the file.
8. Produce all financial data in native format to the extent available. Produce all other Documents as PDFs with optical character recognition.

9. Nothing set forth herein shall constitute or be deemed an admission or waiver of any kind with respect to any rights, defenses, or objections regarding the admissibility or relevance of any Documents produced in response to these Requests.

### **III. DOCUMENTS TO BE PRODUCED**

In accordance with the foregoing Definitions and Instructions, please produce the following:

#### **REQUEST NO. 1**

A complete itemized asset listing corresponding to the following accounts, affiliates of the Debtor, or other assets, including updated asset values as of August 31, 2020:

- a. Highland Capital Management, L.P. (internal account)
- b. Highland Select Equity Fund (Master-Jefferies account)
- c. Highland Select Equity Fund (Feeder account)
- d. Highland Multi Strategy Credit Fund
- e. Highland Restoration Capital Partners
- f. Other balance sheet assets listed for:
  - i. Crusader
  - ii. Petrocap Partners II
  - iii. Petrocap Partners III
  - iv. Highland Capital Management Korea
  - v. Maple Avenue Holdings
  - vi. Highland Capital Management Singapore
  - vii. Penant Management
  - viii. Petrocap Incentive Partners III
- g. Cash balances for the entities listed above.

**REQUEST NO. 2**

All Documents, including monthly NAV statements, bank statements, brokerage statements, valuation reports, etc., supporting the valuations of the assets and loan receivables reported in response to Request No. 1 as of August 31, 2020.

**REQUEST NO. 3**

An itemized listing of all fund liabilities, including updated asset values as of August 31, 2020, for those accounts, affiliates, and other assets listed in Request No. 1.

**REQUEST NO. 4**

Documents evidencing updated principal and interest and the present value of loan receivables as of August 31, 2020.

**REQUEST NO. 5**

Documents evidencing the most recent trial balances, as of August 31, 2020, and corresponding asset listing for the following entities and their subsidiaries, including mapping where applicable:

- a. Highland Select Equity Master Fund L.P. (Select)
- b. Highland Select Equity Fund L.P. (Select)
- c. Highland Restoration Capital Partners Offshore L.P.
- d. Highland Restoration Capital Partners L.P. (RCP)
- e. Highland Multi-Strategy Credit Fund L.P.
- f. Highland Multi-Strategy Master Fund L.P.
- g. Highland Multi Strategy Holdings
- h. HCO Holdings, LLC
- i. HCOF Preferred Holdings, Ltd.



- j. HCOF Preferred Holding, L.P.
- k. Highland Credit Opportunities CDO Financing, LLC
- l. Highland Credit Opportunities CDO, Ltd.
- m. Hibiscus HoldCo, LLC
- n. Highland Credit Opportunities CDO Asset Holdings GP, Ltd.
- o. Highland Credit Opportunities CDO Asset Holdings, L.P.
- p. Highland Capital Management (Singapore) Pte, Ltd.
- q. Highland Capital Management Korea, Ltd
- r. Highland Capital Management Latin America L.P.
- s. HE Capital LLC
- t. Eames, Ltd
- u. Penant Management L.P.
- v. Highland Diversified Credit Fund L.P.
- w. Maple Avenue Holdings LLC

**REQUEST NO. 6**

Documents showing trial balances and a detailed listing of the assets and liabilities as of December 31, 2017, December 31, 2018, December 31, 2019, March 31, 2020, June 30, 2020, and August 31, 2020 of Rand Advisors, LLC and Rand PE Fund I, LP.

**REQUEST NO. 7**

Documents related to the Debtor's rabbi trusts, including any Documents evidencing the date and reason for termination of any insurance policies contributed to such trusts that are no longer in force, for the period of January 1, 2011 through the present.

**REQUEST NO. 8**

All Documents pertaining to the assets and liabilities of HFP, CDO Fund, and SOHC, including, but not limited to:

- a.** consolidated and stand-alone audited annual financial statements for the twelve months ending December 31, 2007 through December 31, 2019, or through the most recent period available;
- b.** unaudited monthly financial statements for the periods ending December 31, 2007 through August 31, 2020, or through the most recent period available;
- c.** consolidating schedules (balance sheet and income statements) that reconcile the stand-alone financial statements for the entities / subsidiaries and periods listed in items (a) and (b) to their corresponding consolidated financial statements;
- d.** itemized detail of minority interests, if any, reported within the audited / unaudited financial statements requested in items (a) and (b) and the corresponding percentage owned by the individual entities and subsidiaries referred to therein;
- e.** monthly trial balances for the periods ending December 31, 2007 through August 31, 2020, or through the most recent period available (please ensure field names are displayed in full and not partially cut-off);
- f.** mapping of trial balance accounts requested in item (e) to the asset / liability / equity categories included in the audited / unaudited financial statements requested in items (a) and (b);
- g.** general ledger detail for the period January 1, 2008 through December 1, 2019, or the most recent period available;

- h.** complete itemized asset listings, including assets and corresponding values as of December 31, 2007 which correspond with the values reported in the audited financial statements for each corresponding entity and subsidiary for the period ending December 31, 2007;
- i.** a monthly roll-forward of the itemized asset listing and corresponding values requested in item (h) from December 31, 2007 through August 31, 2020, or the most recent period available, indicating each asset addition and disposal;
- j.** for all activity (additions / disposals) associated with the itemized assets requested in items (h) and (i), a transaction listing of all related party or affiliated transactions (including date and amount of transaction, asset, and specific affiliate and/or related party to the transaction); and
- k.** any information (including third party support such as bank or brokerage statements, third party valuation reports, marks, etc.) supporting the values of the itemized asset listings reported in items (h) and (i) for each corresponding period.

**REQUEST NO. 9**

Documents related to the Greenbriar CLO, Ltd. asset held by CDO Fund:

- a.** an itemized listing of any affiliates or related parties that own any of the remaining tranches in Greenbriar CLO, Ltd. (Class E Notes, Class I Preference Shares, and/or Class II Preference Shares), including the current principal balance held or number of Class I or Class II Preference Shares owned;
- b.** an itemized listing of any affiliates or related parties that previously owned any tranches in Greenbriar CLO, Ltd. (Class A – E Notes, Class I Preference Shares,

and/or Class II Preference Shares) that were paid off, transferred, or otherwise disposed. Include the Class of Notes or Shares owned, principal balance held or number of shares owned, and disposition of asset (matured / paid-in-full, sold, transferred, etc.). If sold or transferred, include the name of the entity the asset was sold or transferred to, date sale or transfer occurred, and amount of proceeds received from sale or transfer; and

- c. all Documents forecasting the estimated recovery of the remaining tranches in Greenbriar CLO, Ltd. (Class E Notes, Class I Preference Shares, and/or Class II Preference Shares) through maturity.

**REQUEST NO. 10**

All Documents related to redemption payables liability of Highland Multi-Strategy Credit Fund, L.P. for the period of January 1, 2009 through the present.

**REQUEST NO. 11**

All Documents related to the Crusader Fund asset that was included in the “Other Balance Sheet Assets” reported on Slide 2 of the Debtor’s presentation to the Committee dated April 16, 2020, attached hereto as Exhibit A, for the period of January 1, 2011 through the present.

**REQUEST NO. 12**

Documents related to Cornerstone Healthcare Group:

- a. All Documents provided to or relied upon by Houlihan Lokey for its June 30, 2020 valuation of Cornerstone Healthcare Group;
- b. All Documents provided to or relied upon by Houlihan Lokey for prior valuations of Cornerstone Healthcare Group that were incorporated into or

relied upon for its June 30, 2020 valuation of Highland Cornerstone Healthcare Group; and

- c. All Documents provided to or relied upon by Houlihan Lokey for subsequent valuations of Cornerstone Healthcare Group.

Dated this 28th day of September, 2020.

**LATHAM & WATKINS LLP**

By /s/ Sarah Tomkowiak

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AG, London Branch*