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*Counsel for Highland Capital Management, L.P.*

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

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HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

JAMES DONDERO, NANCY DONDERO, AND THE  
DUGABOY INVESTMENT TRUST,

Defendants.

§  
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Adv. Proc. No. 21-03003-sgj

Case No. 3:21-cv-00881-X

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HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

HIGHLAND CAPITAL MANAGEMENT FUND  
ADVISORS, L.P.,

Defendant.

§  
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§

Adv. Proc. No. 21-03004-sgj

Case No. 3:21-cv-00881-X



HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

NEXPOINT ADVISORS, L.P., JAMES DONDERO, NANCY DONDERO, AND THE DUGABOY INVESTMENT TRUST,

Defendants.

Adv. Proc. No. 21-03005-sgj

Case No. 3:21-cv-00881-X

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

HIGHLAND CAPITAL MANAGEMENT SERVICES, INC., JAMES DONDERO, NANCY DONDERO, AND THE DUGABOY INVESTMENT TRUST,

Defendants.

Adv. Proc. No. 21-03006-sgj

Case No. 3:21-cv-00881-X

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

HCRE PARTNERS, LLC (n/k/a NexPoint Real Estate Partners, LLC), JAMES DONDERO, NANCY DONDERO, AND THE DUGABOY INVESTMENT TRUST,

Defendants.

Adv. Proc. No. 21-03007-sgj

Case No. 3:21-cv-00881-X

**DECLARATION OF JOHN A. MORRIS IN SUPPORT OF HIGHLAND CAPITAL MANAGEMENT, L.P.'S MOTION FOR LEAVE TO SUPPLEMENT BACKUP DOCUMENTATION IN SUPPORT OF PROPOSED JUDGMENT**

I, John A. Morris, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, declare as follows:

1. I am an attorney in the law firm of Pachulski, Stang, Ziehl & Jones LLP, counsel to Highland Capital Management, L.P. (“Highland” or “Plaintiff”), and I submit this Declaration in support of *Highland Capital Management, L.P.’s Motion for Leave to Supplement Backup Documentation in Support of Proposed Judgment* (the “Motion”)<sup>1</sup> being filed concurrently with this Declaration. I submit this Declaration based on my personal knowledge and review of the documents listed below.

2. Attached as **Exhibit A** is a true and correct copy of an email communication between myself and Defendants’ counsel, dated September 20, 2022.

3. Attached as **Exhibit B** is a true and correct copy of the January 2022 invoice, which was inadvertently omitted from the Backup Documentation.

4. Attached as **Exhibit C** is a true and correct copy of the February 2022 invoice, which was inadvertently omitted from the Backup Documentation.

Dated: September 27, 2022

/s/ John A. Morris  
John A. Morris

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<sup>1</sup> Capitalized terms not defined herein shall take on the meanings ascribed thereto in the Motion.

# **EXHIBIT A**

**From:** John A. Morris

**Sent:** Tuesday, September 20, 2022 5:21 PM

**To:** Aigen, Michael P. ([michael.aigen@stinson.com](mailto:michael.aigen@stinson.com)) <[michael.aigen@stinson.com](mailto:michael.aigen@stinson.com)>; Deborah R. Deitsch-Perez ([deborah.deitschperez@stinson.com](mailto:deborah.deitschperez@stinson.com)) <[deborah.deitschperez@stinson.com](mailto:deborah.deitschperez@stinson.com)>; Rukavina, Davor ([drukavina@munsch.com](mailto:drukavina@munsch.com)) <[drukavina@munsch.com](mailto:drukavina@munsch.com)>; Berghman, Thomas ([tberghman@munsch.com](mailto:tberghman@munsch.com)) <[tberghman@munsch.com](mailto:tberghman@munsch.com)>

**Cc:** Hayley R. Winograd <[hwinograd@pszilaw.com](mailto:hwinograd@pszilaw.com)>

**Subject:** Highland: Defendants' Objections to Proposed Forms of Order

Counsel:

We write with respect to the Defendants' first two objections to the proposed forms of judgment: (a) the alleged "math error" of \$395,996.50, and (b) redactions (the "Relevant Objections").

1. There was no math error

We do not believe there was any "math error." There difference is accounted for in two ways.

- First, as you presumably saw, we inadvertently omitted the invoices for January and February 2022 from HCMLP's initial submission, two particularly heavy months given the substantial motion practice.
- Second, as indicated in Defendants' footnote 2, some entries were redacted because they referred to tasks unrelated to the Notes litigation; but if you add the un-redacted time and multiplied it by the hourly rate of the applicable time keeper, you'd have compensable time.

Attached is a zip file with certain information.

Included are the invoices for January and February 2022, which total \$307,493.50 (and which therefore accounts for almost 80% of the alleged "math error").

Also included at the bottom of the zip file is a "summary" of the PSZJ fees.

The "back up" for each monthly amount on the "summary" lists the entries on each invoice for which compensation is sought; we also included the actual, redacted invoices for your convenience.

If you take the two issues identified above into account, we find no error.

2. Redactions

As I explained in my Declaration, HCMLP does not seek to charge the Defendants for any entries that are redacted (see paragraph 10). Redactions were heavy until August 2021 because ALL litigation was charged under the generic code "BL" (for "bankruptcy litigation"). The redacted entries were for work unrelated to the Notes Litigation; again, *no* compensation is sought for those entries. Note that, as reflected in the "back up," if portions of an entry are un-redacted, then compensation is sought for those portions but (again) you have to manually add the time and multiply it by the hourly rate of the time keeper.

3. Proposal

We would like to try to stipulate these issues to reduce the burden on the Court – particularly issues for which there should be an objectively “final answer” – and we have two options:

- A. After reviewing the summary and the “back up,” stipulate (a) to an aggregate number, (b) that HCMLP does not seek compensation for any “redacted entries,” and (c) the Defendants withdraw the Relevant Objections. We can draft a simple Stipulation for your consideration if that would be helpful.
- B. If not, we’ll file a motion for leave to supplement the record with the attached documents and we’ll lay all of this out for the Court, but please let us know if Defendants are opposed or unopposed to such a motion.

Please let us know if you have any questions about the information in the zip file. Otherwise, please let us know how the Defendants would like to proceed by noon on Friday.

Regards,

John

**John A. Morris**

Pachulski Stang Ziehl & Jones LLP

Direct Dial: 212.561.7760

Tel: 212.561.7700 | Fax: 212.561.7777

[jmorris@pszjlaw.com](mailto:jmorris@pszjlaw.com)

[vCard](#) | [Bio](#) | [LinkedIn](#)



Los Angeles | San Francisco | Wilmington, DE | New York | Houston

## **EXHIBIT B**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

January 31, 2022

Invoice 129683

Client 36027

Matter 00004

**JNP**

Board of Directors  
Highland Capital Management LP  
100 Crescent Court, Suite 1850  
Dallas, TX 75201

RE: Notes Litigation

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 01/31/2022**

FEES	\$140,045.50
<b>TOTAL CURRENT CHARGES</b>	<b>\$140,045.50</b>
<b>TOTAL BALANCE DUE</b>	<b>\$140,045.50</b>



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Highland Capital Management LP  
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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GVD	Demo, Gregory Vincent	Counsel	1095.00	1.50	\$1,642.50
HRW	Winograd , Hayley R.	Associate	750.00	83.50	\$62,625.00
JAK	Kroop, Jordan A.	Counsel	1195.00	0.80	\$956.00
JAM	Morris, John A.	Partner	1395.00	42.30	\$59,008.50
JE	Elkin, Judith	Counsel	1325.00	1.20	\$1,590.00
JMF	Fried, Joshua M.	Partner	1145.00	2.80	\$3,206.00
JNP	Pomerantz, Jeffrey N.	Partner	1445.00	3.00	\$4,335.00
LSC	Canty, La Asia S.	Paralegal	495.00	13.50	\$6,682.50
				<hr/> 148.60	<hr/> \$140,045.50

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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		148.60	\$140,045.50
		148.60	<u>\$140,045.50</u>

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/13/2021	HRW	Call with J. Morris, J. Pomerantz, and J. Kroop (0.8).	0.80	750.00	\$600.00
06/13/2021	HRW	Review motion to dismiss in notes litigations (2.0).	2.00	750.00	\$1,500.00
01/04/2022	JAM	E-mails w/ D. Rukavina, Z. Annable re: hearing on HCMFA motion for leave to amend and Sauter testimony (0.2).	0.20	1395.00	\$279.00
01/05/2022	JNP	Review motion to reconsider notes; Conference with Gregory V. Demo and John A. Morris regarding same.	0.30	1445.00	\$433.50
01/05/2022	JMF	Review motion for reconsideration of order denying expert disclosure.	0.30	1145.00	\$343.50
01/05/2022	JAM	Tel c. w/ L. Canty re: witness and exhibit list (0.1); communications w/ J. Seery, D. Klos re: default letter to HCRE (0.1).	0.20	1395.00	\$279.00
01/05/2022	LSC	Preparation of exhibit list and exhibits for 1_10_22 hearing on HCMFA's second motion to amend.	1.70	495.00	\$841.50
01/06/2022	JNP	Conference with John A. Morris regarding upcoming hearing on answer amendment and related issues.	0.30	1445.00	\$433.50
01/06/2022	JAM	E-mails w/ Z. Annable, J. Pomerantz, G. Demo, H. Winograd re: cross-examination of Sauter and communications with Court (0.3).	0.30	1395.00	\$418.50
01/06/2022	LSC	Preparation of materials for 1_10_22 hearing on HCMFA second motion to amend (.5); finalize and transmit exhibits to local counsel for filing (.6).	1.10	495.00	\$544.50
01/06/2022	JE	Review order to consolidate, motion on discovery to district court and related briefing and various related pleadings.	1.20	1325.00	\$1,590.00
01/06/2022	HRW	Email J. Pomerantz, J. Morris, G. Demo re: Order consolidating notes cases (0.2).	0.20	750.00	\$150.00
01/06/2022	HRW	Review Order consolidating notes cases (0.3).	0.30	750.00	\$225.00
01/07/2022	JMF	Review reply re motion to amend amend answers in notes litigation.	0.50	1145.00	\$572.50
01/07/2022	JAM	Prepare for evidentiary hearing on HCMFA's motion for leave to amend answer (1.2).	1.20	1395.00	\$1,674.00
01/07/2022	HRW	Research re: appeal of order denying motion to extend discovery (1.0).	1.00	750.00	\$750.00
01/07/2022	HRW	Email J. Morris, J. Pomerantz, G. Demo re: HCMFA	0.10	750.00	\$75.00

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		reply ISO second motion to amend the answer (0.1).			
01/07/2022	HRW	Review HCMFA reply ISO second motion to amend the answer (0.8).	0.80	750.00	\$600.00
01/07/2022	HRW	Email J. Pomerantz, J. Morris, G. Demo re: appeal of order denying motion to extend discovery (0.5).	0.50	750.00	\$375.00
01/07/2022	HRW	Email Z. Annable re: appeal of order denying motion to extend discovery (0.1).	0.10	750.00	\$75.00
01/08/2022	JAM	Prepare for evidentiary hearing on HCMFA's motion for leave to amend its answer (4.1).	4.10	1395.00	\$5,719.50
01/10/2022	JNP	Conference with John A. Morris regarding hearing on motion to amend answer.	0.10	1445.00	\$144.50
01/10/2022	JAM	Prepare for hearing on HCMFA's motion for leave to amend (7.2); hearing on HCMFA's motion for leave to amend (4.7); tel c. w/ G. Demo re: follow up to hearing (0.1).	12.00	1395.00	\$16,740.00
01/10/2022	JAM	Tel c. w/ J. Pomerantz, G. Demo, adversaries, court re: consolidation implications and briefing (0.4).	0.40	1395.00	\$558.00
01/10/2022	LSC	Revise witness and exhibit list and coordinate filing of same with local counsel (.3); prepare for and assist at hearing on HCMFA's Second Motion to Amend Answer (5.5).	6.40	495.00	\$3,168.00
01/10/2022	GVD	Conference with J. Morris re follow up to hearing re amendment of complaint	0.10	1095.00	\$109.50
01/10/2022	HRW	Email J. Morris re: second HCMFA adversary proceeding (0.1).	0.10	750.00	\$75.00
01/10/2022	HRW	Research re: motion to reconsider order denying motion to extend discovery (1.5).	1.50	750.00	\$1,125.00
01/10/2022	HRW	Hearing on HCMFA second motion to amend answer (4.5).	4.50	750.00	\$3,375.00
01/10/2022	HRW	Review HCMFA rule 26 disclosures (0.2).	0.20	750.00	\$150.00
01/10/2022	HRW	Email J. Pomerantz, J. Morris, G. Demo re: motion for reconsideration of order denying motion to extend discovery (0.3).	0.30	750.00	\$225.00
01/11/2022	JAM	E-mails w/ J. Pomerantz, G. Demo, M. Aigen re: request for extension of time to oppose motion for PSJ (0.3).	0.30	1395.00	\$418.50
01/11/2022	HRW	Research re: appeal of order denying motion to extend discovery (3.0).	3.00	750.00	\$2,250.00
01/11/2022	HRW	Review emails from opposing counsel and J. Morris re: scheduling for MSJ (0.1).	0.10	750.00	\$75.00

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/11/2022	HRW	Email J. Kroop re: appeal of order denying motion to extend discovery (0.2).	0.20	750.00	\$150.00
01/11/2022	HRW	Email J. Kroop re: consolidation of appeals of order denying arbitration (0.1).	0.10	750.00	\$75.00
01/11/2022	HRW	Email J. Pomerantz, J. Kroop, J. Morris, G. Demo re: appeal of order denying motion to extend discovery (0.3).	0.30	750.00	\$225.00
01/11/2022	JAK	Review of strategic considerations for consolidation of four appeals of arbitration denial in emails with Hayley Winograd.	0.30	1195.00	\$358.50
01/11/2022	JAK	Analyze legal issues pertaining to motion for reconsideration under Rule 72 as opposed to direct appeal with Hayley Winograd.	0.50	1195.00	\$597.50
01/12/2022	JNP	Conference with Hayley R. Winograd, John A. Morris and Gregory V. Demo regarding consolidation order and next steps.	0.50	1445.00	\$722.50
01/12/2022	JAM	Review draft stipulation extending briefing schedule on PSJ motion (0.2); e-mails w/ Defense counsel re: stipulation extending briefing schedule on PSJ motion (0.1); tel c. w/ J. Pomerantz, G. Demo, H. Winograd re: strategy for addressing motions in District Court (0.5).	0.80	1395.00	\$1,116.00
01/12/2022	GVD	Conference with J. Pomerantz, J. Morris, and H. Winograd re notes litigation issues and next steps	0.50	1095.00	\$547.50
01/12/2022	HRW	Email J. Morris, J. Pomerantz, G. Demo re: pending motions in consolidated cases (0.1).	0.10	750.00	\$75.00
01/12/2022	HRW	Call with G. Demo, J. Morris, G. Demo re: nexpoint objection to order denying motion to extend (0.6).	0.60	750.00	\$450.00
01/12/2022	HRW	Review order re: pending motions in consolidated cases (0.1).	0.10	750.00	\$75.00
01/12/2022	HRW	Research re: response to nexpoint objection to order denying motion to extend (3.0).	3.00	750.00	\$2,250.00
01/13/2022	HRW	Research and draft response to nexpoint objection to order denying motion to extend (5.0).	5.00	750.00	\$3,750.00
01/14/2022	JNP	Emails regarding response to motion for reconsideration of expert discovery order.	0.10	1445.00	\$144.50
01/14/2022	JAM	Review/revise HCMFA's draft stipulation concerning the withdrawal of the reference in HCMFA II (0.7); e-mail to defense counsel, J. Pomerantz, G. Demo, H. Winograd re: revised draft stipulation concerning the withdrawal of the reference in HCMFA II (0.1).	0.80	1395.00	\$1,116.00

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/14/2022	HRW	Email Z. Annable re: objection to order denying motion to extend (0.1).	0.10	750.00	\$75.00
01/14/2022	HRW	Draft response to nexpoint objection to order denying motion to extend (2.5).	2.50	750.00	\$1,875.00
01/14/2022	HRW	Email J. Morris stipulation re: briefing schedule on nexpoint objection to order denying motion to extend (0.1).	0.10	750.00	\$75.00
01/14/2022	HRW	Review nexpoint motion re: objection to order denying motion to extend (0.2).	0.20	750.00	\$150.00
01/14/2022	HRW	Call with J. Morris re: nexpoint objection to order denying motion to extend (0.2).	0.20	750.00	\$150.00
01/14/2022	HRW	Draft stipulation re: briefing schedule on nexpoint objection to order denying motion to extend (0.5).	0.50	750.00	\$375.00
01/14/2022	HRW	Email J. Pomerantz, J. Morris, G. Demo re: nexpoint objection to order denying motion to extend (0.2).	0.20	750.00	\$150.00
01/17/2022	HRW	Draft response to nexpoint objection to order denying motion to extend (6.5).	6.50	750.00	\$4,875.00
01/18/2022	JNP	Review stipulation with retail boards regarding discovery and conference with John A. Morris regarding same.	0.20	1445.00	\$289.00
01/18/2022	HRW	Draft response to nexpoint objection to order denying motion to extend (6.0).	6.00	750.00	\$4,500.00
01/19/2022	JNP	Review of retail boards stipulation; Conference with John A. Morris regarding.	0.20	1445.00	\$289.00
01/19/2022	JAM	E-mails w/ M. Aigen, J. Pomerantz, G. Demo, H. Winograd re: request for extension of page limit (0.2).	0.20	1395.00	\$279.00
01/19/2022	HRW	Draft response to nexpoint objection to order denying motion to extend (7.0) / Code: NL	7.00	750.00	\$5,250.00
01/19/2022	HRW	Review email from opposing counsel to Court re: re: extension of page limit for MSJ (0.1).	0.10	750.00	\$75.00
01/19/2022	HRW	Review email between J. Morris and opposing counsel re: extension of page limit for MSJ (0.1).	0.10	750.00	\$75.00
01/20/2022	JNP	Conference with John A. Morris regarding various litigation updates.	0.20	1445.00	\$289.00
01/20/2022	JNP	Review emails regarding motion to extend page limit for response.	0.10	1445.00	\$144.50
01/20/2022	JNP	Conference with John A. Morris regarding summary judgment motion and related.	0.20	1445.00	\$289.00
01/20/2022	JMF	Review opposition to motion for summary	0.50	1145.00	\$572.50

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		judgment.			
01/20/2022	JAM	E-mails w/ defense counsel, court, internal team re: page limit issues (0.6); review J. Dondero Declaration for HCMFA opposition (0.4); tel c. w/ H. Winograd re: notes litigation (0.1); tel c. w/ J. Pomerantz re: status, HCMFA filing (0.2).	1.30	1395.00	\$1,813.50
01/20/2022	GVD	Review responses to motions for summary judgment	0.50	1095.00	\$547.50
01/20/2022	HRW	Review stipulation re: briefing schedule on nexpoint objection to order denying motion to extend (0.2).	0.20	750.00	\$150.00
01/20/2022	HRW	Review email between J. Morris and opposing counsel re: extension of page limit for MSJ (0.2).	0.20	750.00	\$150.00
01/20/2022	HRW	Review J. Morris email from J. Morris to Court re: extension of page limit for MSJ (0.1).	0.10	750.00	\$75.00
01/20/2022	HRW	Draft response to nexpoint objection to order denying motion to extend (7.0).	7.00	750.00	\$5,250.00
01/20/2022	HRW	Email J. Morris re: stipulation on briefing schedule for nexpoint objection to order denying motion to extend (0.1).	0.10	750.00	\$75.00
01/20/2022	HRW	Review emails re: scheduling of MSJ oral argument (0.1).	0.10	750.00	\$75.00
01/21/2022	JNP	Conference with John A. Morris regarding potential sanctions for order violations.	0.20	1445.00	\$289.00
01/21/2022	JMF	Review motion to withdraw reference re Dondero notes litigation proceeding.	0.50	1145.00	\$572.50
01/21/2022	JAM	E-mails w/ defense counsel, J. Pomerantz, J. Seery re: timing of oral argument on notes litigation (0.3); review appendix in support of defendants' opposition (0.5); draft e-mail re: potential contempt motion (0.6).	1.40	1395.00	\$1,953.00
01/21/2022	GVD	Conference with J. Morris re responses to motions for summary judgment and next steps (0.1); review draft email from J. Morris re contempt issues (0.1)	0.20	1095.00	\$219.00
01/21/2022	HRW	Review J. Morris email re: motion to move argument on MSJ motion (0.1).	0.10	750.00	\$75.00
01/21/2022	HRW	Review email from J. Morris re: notice of intent to file contempt motion re: MSJ evidence (0.1).	0.10	750.00	\$75.00
01/21/2022	HRW	Review B. Asskin email re: motion to exceed page limit in MSJ response (0.1).	0.10	750.00	\$75.00
01/21/2022	HRW	Review J. Morris email re: contempt for MSJ evidence (0.1).	0.10	750.00	\$75.00
01/21/2022	HRW	Review Dondero renewed motion for ruling on R&R	0.20	750.00	\$150.00

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		(0.2).			
01/21/2022	HRW	Review email J. Pomerantz and J. Morris re: Dondero renewed motion for ruling on R&R (0.1).	0.10	750.00	\$75.00
01/21/2022	HRW	Email J. Morris, J. Pomerantz, G. Demo re: re: notice of intent to file contempt motion re: MSJ evidence (0.1).	0.10	750.00	\$75.00
01/21/2022	HRW	Email J. Pomerantz re: Dondero renewed motion for ruling on R&R (0.1).	0.10	750.00	\$75.00
01/21/2022	HRW	Review consolidation order (0.2).	0.20	750.00	\$150.00
01/22/2022	JAM	E-mails w/ J. Seery, J. Pomerantz, G. Demo, H. Winograd, defense counsel re: possible contempt motion (0.3).	0.30	1395.00	\$418.50
01/22/2022	HRW	Review email from J. Morris re: re: notice of intent to file contempt motion re: MSJ evidence (0.1).	0.10	750.00	\$75.00
01/24/2022	JMF	Review motion to withdraw reference re Dondero adversary.	0.30	1145.00	\$343.50
01/24/2022	JAM	Review/analyze briefs in opposition to SJ motion (4.3); e-mails w/ M. Aigen re: contempt motion (0.2); tel c. w/ H. Winograd re: review of opposition papers and plans for reply (0.5).	5.00	1395.00	\$6,975.00
01/24/2022	HRW	Edit stipulation for motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/24/2022	HRW	Email J. Morris re: stipulation for motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/24/2022	HRW	Email D. Rukavina and M. Aigen re: stipulation for motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/24/2022	HRW	Call with J. Morris re: MSJ reply (0.5).	0.50	750.00	\$375.00
01/25/2022	JAM	Review/revise stipulation concerning "appeal" of expert order (0.1); e-mails w/ M. Aigen, others re: contempt (0.1); review opposition papers (1.1).	1.30	1395.00	\$1,813.50
01/25/2022	HRW	Review emails re: scheduling of MSJ hearing (0.1).	0.10	750.00	\$75.00
01/25/2022	HRW	Review emails from J. Morris and M. Aigen re: MSJ evidence (0.2).	0.20	750.00	\$150.00
01/25/2022	HRW	Email J. Morris, G. Demo, J. Pomerantz re: contempt motion re: MSJ filing (0.2).	0.20	750.00	\$150.00
01/25/2022	HRW	Email D. Rukavina and M. Aigen re: stipulation for motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/25/2022	HRW	Research for contempt motion re: MSJ filing (1.0).	1.00	750.00	\$750.00
01/26/2022	JAM	E-mail to defense counsel re: possible contempt motion (0.9); work on reply brief (1.7).	2.60	1395.00	\$3,627.00



Pachulski Stang Ziehl & Jones LLP  
 Highland Capital Management LP  
 36027 - 00004

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 January 31, 2022

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/26/2022	HRW	Draft response to nexpoint objection to order denying motion to extend (6.0).	6.00	750.00	\$4,500.00
01/26/2022	HRW	Draft HCMFA discovery requests for second notes adversary (0.5).	0.50	750.00	\$375.00
01/26/2022	HRW	Review emails from J. Morris and M. Aigen re: MSJ evidence (0.1).	0.10	750.00	\$75.00
01/26/2022	HRW	Review D. Rukavina email re: scheduling of briefing on motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/27/2022	JNP	Review reply regarding motion for reconsideration and conference with Hayley R. Winograd regarding same.	0.30	1445.00	\$433.50
01/27/2022	JMF	Review motion for reconsideration re order denying request to amended answer.	0.40	1145.00	\$458.00
01/27/2022	JAM	Review/revise draft brief in opposition to motion for reconsideration of denial of expert motion (1.0); continued review of opposition papers (2.8).	3.80	1395.00	\$5,301.00
01/27/2022	GVD	Conference with J. Morris re status of notes litigation	0.20	1095.00	\$219.00
01/27/2022	HRW	Draft response to nexpoint objection to order denying motion to extend (1.8).	1.80	750.00	\$1,350.00
01/27/2022	HRW	Email J. Pomerantz, G. Demo, J. Morris re: response and objection to motion for reconsideration (0.2).	0.20	750.00	\$150.00
01/27/2022	HRW	Email J. Pomerantz, G. Demo, J. Morris re: HCMFA motion for reconsideration of order denying motion to amend (0.1).	0.10	750.00	\$75.00
01/27/2022	HRW	Email L. Canty re: response and objection to motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/27/2022	HRW	Call with J. Pomerantz re: response and objection to motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/27/2022	HRW	Review HCMFA motion for reconsideration of order denying motion to amend (0.3).	0.30	750.00	\$225.00
01/28/2022	JNP	Conference with John A. Morris regarding summary judgment and related issues.	0.20	1445.00	\$289.00
01/28/2022	JAM	Continued work on reply for partial summary judgment motion (3.6).	3.60	1395.00	\$5,022.00

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/29/2022	HRW	Draft response to nexpoint motion for reconsideration (2.5).	2.50	750.00	\$1,875.00
01/30/2022	JAM	[REDACTED] review/revise objection to appeal of order denying extension of expert discovery deadline (0.4); tel c. w/ H. Winograd re: reply briefs for notes litigation SJ motion (0.5).	[REDACTED]	1395.00	[REDACTED]
01/30/2022	LSC	Preparation of appendix in support of objection to motion for reconsideration, including updates to objection and amendments to same.	4.30	495.00	\$2,128.50
01/30/2022	HRW	Email J. Seery re: nexpoint motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/30/2022	HRW	Draft response to nexpoint motion for reconsideration (1.0).	1.00	750.00	\$750.00
01/30/2022	HRW	Call with L. Canty re: nexpoint motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/30/2022	HRW	Call with J. Morris re: MSJ (0.5).	0.50	750.00	\$375.00
01/31/2022	JNP	Review final draft of response regarding motion for reconsideration.	0.10	1445.00	\$144.50
01/31/2022	JMF	Review reply to motion for reconsideration of bankruptcy order re expert discovery.	0.30	1145.00	\$343.50
01/31/2022	JAM	Communications w/ H. Winograd re: revisions to brief in opposition to reconsideration of order denying extension of expert discovery deadline (0.3); review final brief in opposition to reconsideration of expert discovery order (0.2); [REDACTED].	[REDACTED]	1395.00	[REDACTED]
01/31/2022	HRW	Email J. Morris re: response to nexpoint motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/31/2022	HRW	Research re: reply to HCMFA summary judgment (2.5).	2.50	750.00	\$1,875.00
01/31/2022	HRW	Call with J. Morris re: response to nexpoint motion for reconsideration (0.1).	0.10	750.00	\$75.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
01/31/2022	HRW	Call with L. Canty re: nexpoint motion for reconsideration (0.1).	0.10	750.00	\$75.00
01/31/2022	HRW	Draft and file response to nexpoint motion for reconsideration (2.5).	2.50	750.00	\$1,875.00



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Highland Capital Management LP  
36027 -00004

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January 31, 2022

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**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 01/31/2022**

**Total Fees \$140,045.50**

**Total Due on Current Invoice \$140,045.50**

**Outstanding Balance from prior invoices as of 01/31/2022 (May not include recent payments)**

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
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<b>Total Amount Due on Current and Prior Invoices:</b>				<b>\$140,045.50</b>
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## **EXHIBIT C**

**Pachulski Stang Ziehl & Jones LLP**

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

February 28, 2022

Invoice 129792

Client 36027

Matter 00004

**JNP**

James P. Secry, Jr.  
Highland Capital Management LP  
100 Crescent Court, Suite 1850  
Dallas, TX 75201

RE: Notes Litigation

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/28/2022**

FEES	\$172,582.50
<b>TOTAL CURRENT CHARGES</b>	<b>\$172,582.50</b>
<b>BALANCE FORWARD</b>	<b>\$140,045.50</b>
<b>LAST PAYMENT</b>	<b>\$140,045.50</b>
<b>TOTAL BALANCE DUE</b>	<b>\$172,582.50</b>

Pachulski Stang Ziehl & Jones LLP  
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**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GVD	Demo, Gregory Vincent	Counsel	1095.00	2.40	\$2,628.00
HRW	Winograd , Hayley R.	Associate	750.00	103.00	\$77,250.00
JAM	Morris, John A.	Partner	1395.00	51.80	\$72,261.00
JMF	Fried, Joshua M.	Partner	1145.00	2.20	\$2,519.00
JNP	Pomerantz, Jeffrey N.	Partner	1445.00	1.10	\$1,589.50
LSC	Canty, La Asia S.	Paralegal	495.00	33.00	\$16,335.00
				<hr/>	<hr/>
				193.50	\$172,582.50

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**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		193.50	\$172,582.50
		193.50	<u>\$172,582.50</u>



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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/03/2021	LSC	Prepare appendix in support of motion to consolidate actions.	0.40	495.00	\$198.00
01/26/2022	LSC	Research and transmittal of various documents, including discovery, in connection with preparation for response to motion for reconsideration.	2.10	495.00	\$1,039.50
02/01/2022	JAM	Tel c. w/ H. Winograd re: motion to strike and for sanctions re: Tully Report and barred defense (0.4).	0.40	1395.00	\$558.00
02/01/2022	HRW	Draft reply ISO motion for summary judgment (3.5).	3.50	750.00	\$2,625.00
02/01/2022	HRW	Call with J. Morris re: reply ISO motion for summary judgment (0.3).	0.30	750.00	\$225.00
02/01/2022	HRW	Email J. Pomerantz, J. Morris, G. Demo re: HCMFA motion for reconsideration of order denying motion to amend (0.1).	0.10	750.00	\$75.00
02/01/2022	HRW	Email J. Morris re: reply ISO motion for summary judgment (0.1).	0.10	750.00	\$75.00
02/02/2022	JAM	Work on reply papers (3.7).	3.70	1395.00	\$5,161.50
02/02/2022	HRW	Draft reply ISO motion for summary judgment (7.5).	7.50	750.00	\$5,625.00
02/03/2022	JAM	Tel c. w/ H. Winograd re: HCMFA opposition to motion for summary judgment (0.2); work on reply in support of motion for partial summary judgment (5.5).	5.70	1395.00	\$7,951.50
02/03/2022	HRW	Draft reply ISO summary judgment (8.5).	8.50	750.00	\$6,375.00
02/04/2022	JAM	Begin drafting sanctions motion (2.2).	2.20	1395.00	\$3,069.00
02/04/2022	JAM	Continued work on reply for PSJ motion (4.1); tel c. w/ H. Winograd re: status of drafting replies (0.1).	4.20	1395.00	\$5,859.00
02/04/2022	HRW	Draft reply ISO summary judgment (9.0).	9.00	750.00	\$6,750.00
02/05/2022	JAM	Work on contempt motion (3.7);	3.70	1395.00	\$5,161.50
02/05/2022	HRW	Draft reply ISO summary judgment (9.5).	9.50	750.00	\$7,125.00
02/06/2022	JAM	Continued work on Reply for Alleged Agreement Defendants (7.5); tel c. w/ J. Seery re: reply for motion for partial summary judgment and related matters (0.2); e-mails w/ J. Seery, PSZJ team re: reply brief (0.2).	7.90	1395.00	\$11,020.50
02/06/2022	JAM	Continued work on contempt motion (1.6); e-mail to PSZJ team re: contempt motion (0.1); e-mail to L. Canty, H. Winograd re: exhibits for contempt motion (0.2).	1.90	1395.00	\$2,650.50

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/06/2022	LSC	Preparation of appendix and exhibits to motion for sanctions/contempt.	1.40	495.00	\$693.00
02/06/2022	GVD	Review draft contempt motion	0.50	1095.00	\$547.50
02/06/2022	HRW	Draft reply ISO summary judgment (10.0).	10.00	750.00	\$7,500.00
02/06/2022	HRW	Draft motions for contempt and to strike summary judgment evidence (2.0).	2.00	750.00	\$1,500.00
02/07/2022	JNP	Conference with John A. Morris regarding motion to strike.	0.30	1445.00	\$433.50
02/07/2022	JNP	Review latest version of motion to strike.	0.10	1445.00	\$144.50
02/07/2022	JMF	Review motions to strike and sanctions re expert discovery.	0.60	1145.00	\$687.00
02/07/2022	JAM	Continued work on contempt motion (3.4); e-mails to J.. Seery, PSZJ team re: contempt motion (0.1).	3.50	1395.00	\$4,882.50
02/07/2022	JAM	Work on reply papers (including HCMFA brief, non-HCMFA brief, JAM Declaration, Klos Declaration) (10.3); tel c. w/ H. Winograd re: reply papers (0.1); tel c. w/ G. Demo re: reply papers (0.1); tel c. w/ D. Klos re: Klos Declaration (0.2); tel c. w/ J. Pomerantz re: reply papers (0.3); tel c. w/ D. Klos re: Klos Declaration (0.2); tel c. w/ J. Seery re: reply papers (0.1); tel c. w/ J. Seery, D. Klos re: Klos Declaration (0.1); tel c. w/ H. Winograd re: reply papers (0.1); tel c. w/ L. Canty, H. Winograd, Z. Annable re: reply papers (0.4); tel c. w/ H. Winograd re: reply papers (0.1).	12.00	1395.00	\$16,740.00
02/07/2022	LSC	Assist with preparation of contempt motion, including preparation of additional exhibits, preparation of declaration in support of same, and revisions to same.	3.60	495.00	\$1,782.00
02/07/2022	LSC	Assist with preparation of reply in support of summary judgment (non-HCMFA parties), including research, revisions, and insertion of pincites in the same.	3.90	495.00	\$1,930.50
02/07/2022	LSC	Assist with preparation of reply in support of summary judgment (HCMFA), including research, revisions, and insertion of pincites in the same.	4.60	495.00	\$2,277.00
02/07/2022	GVD	Conference with J. Morris re status of notes litigation	0.10	1095.00	\$109.50
02/07/2022	GVD	Review motion for contempt	0.30	1095.00	\$328.50
02/07/2022	GVD	Review transcript re DC Sauter testimony	1.10	1095.00	\$1,204.50
02/07/2022	HRW	Draft reply ISO summary judgment (10.0).	10.00	750.00	\$7,500.00

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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/07/2022	HRW	Draft motions for contempt and to strike summary judgment evidence (1.5).	1.50	750.00	\$1,125.00
02/08/2022	JNP	Conference with John A. Morris regarding summary judgment papers and related issues.	0.20	1445.00	\$289.00
02/08/2022	JMF	Review reply to summary judgment opposition.	0.40	1145.00	\$458.00
02/10/2022	HRW	Review email from Z. Annable with Court re: scheduling for motion to strike and for contempt (0.1).	0.10	750.00	\$75.00
02/11/2022	HRW	Review notice of hearing re: motion to strike and for contempt (0.1).	0.10	750.00	\$75.00
02/11/2022	HRW	Email Z. Annable re: notice of hearing on motion to strike and for contempt (0.1).	0.10	750.00	\$75.00
02/13/2022	HRW	Draft objection and response to HCMFA motion for reconsideration of order denying motion to amend (2.5).	2.50	750.00	\$1,875.00
02/14/2022	JNP	Review reply regarding expert witness reconsideration motion.	0.10	1445.00	\$144.50
02/14/2022	HRW	Draft objection and response to HCMFA motion for reconsideration (6.5).	6.50	750.00	\$4,875.00
02/14/2022	HRW	Review email from J. Pomerantz re: NexPoint reply ISO motion for reconsideration (0.1).	0.10	750.00	\$75.00
02/14/2022	HRW	Review NexPoint reply ISO motion for reconsideration (0.5).	0.50	750.00	\$375.00
02/15/2022	JMF	Review reply to motion to extend expert discovery.	0.30	1145.00	\$343.50
02/15/2022	HRW	Draft objection and response to HCMFA motion for reconsideration (7.5).	7.50	750.00	\$5,625.00
02/15/2022	HRW	Email Z. Annable MSJ amended notice of hearing (0.1).	0.10	750.00	\$75.00
02/15/2022	HRW	Review MSJ amended notice of hearing (0.1).	0.10	750.00	\$75.00
02/15/2022	HRW	Call with L. Canty re: objection and response to HCMFA motion for reconsideration (0.1).	0.10	750.00	\$75.00
02/16/2022	JAM	Tel c. w/ H. Winograd re: objection to appeal of order denying HCMFA leave to amend (0.1).	0.10	1395.00	\$139.50
02/16/2022	LSC	Review and revise draft opposition to motion for reconsideration and continued preparation of appendix/exhibits.	5.30	495.00	\$2,623.50
02/16/2022	HRW	Draft objection and response to HCMFA motion for reconsideration (11.0).	11.00	750.00	\$8,250.00
02/17/2022	JNP	Review reply regarding motion for reconsideration	0.20	1445.00	\$289.00

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Highland Capital Management LP  
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			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		and email to and from Hayley R. Winograd regarding same.			
02/17/2022	JMF	Review oppo to motion to district court to amend answer re review of bankruptcy court order denying motion.	0.50	1145.00	\$572.50
02/17/2022	JAM	Review/revise opposition to HCMFA appeal of denial of motion to amend answer (3.7); communications w/ H. Winograd, Z. Annable re: opposition to HCMFA appeal of denial of motion to amend answer (0.6).	4.30	1395.00	\$5,998.50
02/17/2022	LSC	Assist with preparation of objection to HCMFA motion for reconsideration, including continued preparation of appendix and additional exhibits, review and revisions to objection, and confer and correspond regarding the same.	8.60	495.00	\$4,257.00
02/17/2022	GVD	Review draft response to motion for reconsideration	0.40	1095.00	\$438.00
02/17/2022	HRW	Draft objection and response to HCMFA motion for reconsideration and related tasks (9.5).	9.50	750.00	\$7,125.00
02/18/2022	JAM	Tel c. w/ H. Winograd re: status of notes litigation/briefing (0.2); tel c. w/ H. Winograd re: correction to Appendix, appeals to district court (0.3); e-mail to H. Winograd, L. Canty re: supplementing the appendix for additional costs and expenses in notes litigation (0.2).	0.70	1395.00	\$976.50
02/18/2022	LSC	Attention to amendment to brief in support of motion to strike, including preparation of amended exhibit and confer and correspond with attorneys regarding the same (.4); research and correspondence regarding issue with sealed exhibit (.3).	0.70	495.00	\$346.50
02/18/2022	HRW	Review email from Z. Annable and J. Morris re: response to HCMFA motion for reconsideration and related tasks (0.2).	0.20	750.00	\$150.00
02/18/2022	HRW	Email Z. Annable and J. Morris re: motion for contempt and to strike (0.2).	0.20	750.00	\$150.00
02/18/2022	HRW	Draft errata re: motion for contempt and to strike (0.5).	0.50	750.00	\$375.00
02/24/2022	JAM	E-mails w/ Z. Annable, H. Winograd re: propriety of filing an Appendix in support of the Reply (0.3); review cases concerning the same (0.2).	0.50	1395.00	\$697.50
02/24/2022	LSC	Begin preparation of additional exhibits in connection with summary judgment hearing.	1.30	495.00	\$643.50
02/24/2022	HRW	Review email from M. Aigen and J. Morris re:	0.10	750.00	\$75.00

Pachulski Stang Ziehl & Jones LLP  
 Highland Capital Management LP  
 36027 - 00004

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 February 28, 2022

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
		motion to strike appendix in reply to MSJ pleading (0.1).			
02/24/2022	HRW	Review emails from J. Morris and Z. Annable re: motion to strike appendix in reply to MSJ pleading (0.2).	0.20	750.00	\$150.00
02/24/2022	HRW	Email J. Morris and Z. Annable re: motion to strike appendix in reply to MSJ pleading (0.2).	0.20	750.00	\$150.00
02/24/2022	HRW	Research re: motion to strike appendix in reply to MSJ pleading (1.0).	1.00	750.00	\$750.00
02/25/2022	JNP	Review motion to strike.	0.20	1445.00	\$289.00
02/25/2022	JMF	Review motion to strike appendix re notes litigation.	0.40	1145.00	\$458.00
02/25/2022	JAM	E-mails w/ D. Rukavina, Z. Annable re: sealing of HCMFA 2018 audit report (0.2); preliminary review of motion to strike and communications w/ J. Pomerantz, G. Demo, H. Winograd concerning the same (0.2).	0.40	1395.00	\$558.00
02/25/2022	HRW	Review defendants' motion to strike appendix in MSJ reply (0.3).	0.30	750.00	\$225.00
02/25/2022	HRW	Review emails from J. Morris and D. Rukavina re: HCMFA motion for reconsideration materials and motion to seal document (0.1).	0.10	750.00	\$75.00
02/28/2022	JAM	Preliminary work on response to motion to strike (0.3); preliminary review of opposition to motion to strike/sanctions/contempt (0.3).	0.60	1395.00	\$837.00
02/28/2022	LSC	Preparation of additional exhibits in connection with summary judgment.	1.10	495.00	\$544.50
			<u>193.50</u>		<u>\$172,582.50</u>
<b>TOTAL SERVICES FOR THIS MATTER:</b>					<b>\$172,582.50</b>

Pachulski Stang Ziehl & Jones LLP  
Highland Capital Management LP  
36027 -00004

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Invoice 129792  
February 28, 2022

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**REMITTANCE ADVICE**

**Please include this Remittance with your payment**

**For current services rendered through: 02/28/2022**

**Total Fees \$172,582.50**

**Total Due on Current Invoice \$172,582.50**

**Outstanding Balance from prior invoices as of 02/28/2022 (May not include recent payments)**

<b><u>A/R Bill Number</u></b>	<b><u>Invoice Date</u></b>	<b><u>Fees Billed</u></b>	<b><u>Expenses Billed</u></b>	<b><u>Balance Due</u></b>
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<b>Total Amount Due on Current and Prior Invoices:</b>	<b>\$172,582.50</b>
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