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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**

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



HIGHLAND CAPITAL MANAGEMENT, L.P.,

Plaintiff,

vs.

HIGHLAND CAPITAL MANAGEMENT FUND  
ADVISORS, L.P.,

Defendant.

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.

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Adv. Proc. No. 21-03007-sgj

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

**HIGHLAND CAPITAL MANAGEMENT, L.P.’S RESPONSE TO DEFENDANTS’  
OBJECTIONS TO PLAINTIFF’S PROPOSED FORM OF JUDGMENT AWARDING  
ATTORNEY’S FEES AND COSTS**

Highland Capital Management, L.P., the reorganized debtor and the plaintiff in the above-captioned adversary proceedings (“Highland” or “Plaintiff”), hereby files this response (the “Response”) to *Defendants’ Objections to Plaintiff’s Proposed Form of Judgment Awarding Attorney’s Fees and Costs* (the “Objection”).<sup>1</sup> Highland fully incorporates by reference its contemporaneously filed brief (the “Brief”) in response to the Objection and would show unto the Court as follows:

**RELIEF REQUESTED**<sup>2</sup>

1. By this Response, Highland respectfully requests that the Court enter an order overruling the Objection.

2. Pursuant to Rules 7.1(d) and (h) of the *Local Civil Rules of the United States*

<sup>1</sup> The defendants (collectively, the “Defendants”) filed identical copies of their Objection in each of the Adversary Proceedings. See Adv. Pro. No. 21-03003-sgj, Docket No. 204; Adv. Pro. No. 21-03004-sgj, Docket No. 173; Adv. Pro. No. 21-03005-sgj, Docket No. 221; Adv. Pro. No. 21-03006-sgj, Docket No. 226; Adv. Pro. No. 21-03007-sgj, Docket No. 221.

<sup>2</sup> Capitalized terms shall have the meanings ascribed to them in the Brief.

*District Court for the Northern District of Texas, Dallas Division* (the “Local Rules”), the Brief is being filed contemporaneously with this Response and is incorporated by reference.

**PRAYER**

WHEREFORE, Highland respectfully requests that the Court (i) overrule the Objection, and (ii) grant such other and further relief as the Court deems just and proper.

Dated: September 27, 2022

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-and-

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*/s/ Zachery Z. Annable*

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