

IN THE UNITED STATES DISTRICT 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

Reorganized Debtor.

NEXPOINT REAL ESTATE PARTNERS LLC  
(f/k/a HCRE PARTNERS, LLC),

Appellant,

v.

Civil Case No. 3:24-cv-01479-S

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Appellee.

**APPLICATION FOR ADMISSION PRO HAC VICE**  
(Complete all questions; indicate "N/A" if necessary.)

- I. Applicant is an attorney and a member of the law firm of (or practices under the name of) Pachulski Stang Ziehl & Jones LLP, with offices at 780 Third Avenue, 34<sup>th</sup> Floor, New York, NY 10017  
Tel. (212) 561-7700 Fax: (212) 561-7777
- II. Applicant will sign all filings with the name John A. Morris
- III. Applicant has been retained personally or as a member of the above-names firm by:  
Appellee Highland Capital Management, L.P.  
to provide legal representation in connection with the above-styled matter now pending

<sup>1</sup> The Reorganized Debtor's last four digits of its taxpayer identification number are (8357). The headquarters and service address for the above-captioned Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.



before the United States District Court for the Northern District of Texas.

IV. Applicant is a member in good standing of the bar of the highest court of the state of New York, where Applicant regularly practices law.

For Court Use Only. Bar Status Verified:  <hr/>
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Bar license number: 2405397 Admission date: 02.26.1991

**Attach to this application an original certificate of good standing issued within the past 90 days from the attorney licensing authority in a state in which you are admitted to practice (e.g., State Bar of Texas).**

V. Applicant has also been admitted to practice before the following courts:

Court:	Admission Date:	Active or Inactive
<u>U.S. District Court, Eastern District New York</u>	<u>08.28.1995</u>	<u>Active</u>
<u>U.S. District Court, Southern District New York</u>	<u>01.07.1992</u>	<u>Active</u>

VI. Applicant has never involuntarily lost, temporarily or permanently, the right to practice before any court or tribunal, or resigned in lieu of discipline, except as provided below:

N/A

VII. Applicant has never been subject to grievance proceedings or involuntary removal proceedings—regardless of outcome—while a member of the bar of any state or federal court or tribunal that requires admission to practice, except as provided below:

N/A

VIII. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

**IX.** Applicant has filed for *pro hac vice* admission in the United States District Court for the Northern District of Texas during the past three (3) years in the following matters:

Date of Application

Case No. and Style:

See Attachment

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**X.** Local counsel of record associated with Applicant in this matter is Zachery Z. Annable, who has offices at 10501 N. Central Expy, Ste. 106, Dallas, Texas 75231

Tel. (972) 755-7100

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**XI.** Check the appropriate box below.

For Application in a **Civil Case**



Applicant has read *Dondi Properties Corp. v. Commerce Savs. & Loan Ass'n*, 121 F.R.D.284 (N.D. Tex. 1988) (en banc), and the local civil rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil rules.

For Application in a **Criminal Case**



Applicant has read and will comply with the local criminal rules of this court.

**XII.** Applicant respectfully requests to be admitted to practice in the United States District Court for the Northern District of Texas for this cause only. Applicant certifies that a true and correct copy of this document has been served upon each attorney of record and the original upon the clerk of court, accompanied by a \$100 filing fee, on this the 15th day of July, 2024.

John A. Morris

Printed Name of Applicant

/s/ John A. Morris

Signature

If the applicant files this document through the applicant's electronic-filing account, the applicant's typed name on the signature block constitutes the applicant's signature. If the applicant does not file this document through the applicant's electronic-filing account, the applicant must sign on the signature line.

**STATEMENT OF ADDITIONAL APPLICATIONS**

**IX.** Applicant has filed for *pro hac vice* admission in the United States District Court for the Northern District of Texas during the past three (3) years in the following matters:  
James Dondero vs. Highland Capital Management, L.P., et al. Case No. 3:20-cv-03390-X

UBS Securities LLC and UBS AG, London Branch vs. Highland Capital Management, L.P.,  
Case No. 3:20-cv-03408-G

The Dugaboy Investment Trust and Get Good Trust vs. Highland Capital Management, L.P.,  
Case No. 3:21-cv-00261-L

Highland Capital Management Fund Advisors, L.P. and NexPoint Advisors, L.P. vs. Highland  
Capital Management, L.P., Case No. 3:21-cv-00538-N

Highland Income Fund, NexPoint Strategic Opportunities Fund, Highland Global Allocation  
Fund, and NexPoint Capital, Inc. vs. Highland Capital Management, L.P., Case No. 3:21-cv-  
00539-N

James Dondero vs. Highland Capital Management, L.P., Case No. 3:21-cv-00546-N

The Dugaboy Investment Trust, et al. vs. Highland Capital Management, L.P., Case No. 3:21-  
cv- 00550-N

Charitable DAF Fund et al. vs. Highland Capital Management LP et al., Case No. 3:21-  
cv- 00842-B

James Dondero, et al. vs. Jernigan, Case No. 3:21-cv-00879-K

Highland Capital Management, L.P. vs. NexPoint Advisors LP, Case No. 3:21-cv-00880-X

Highland Capital Management LP et al v. Highland Capital Management Fund Advisors LP,  
Case No. 3:21-cv-00881-X

PCMG Trading Partners XXIII LP v. Highland Capital Management LP, Case No. 3:21-cv-  
01169-N

The Dugaboy Investment Trust and Get Good Trust et al v. Highland Capital Management LP,  
Case No. 3:21-cv-01295-X

Highland Capital Management, L.P., vs. Highland Capital Management Services, Inc., Case  
No. 3:21-cv-01378-X

Highland Capital Management, L.P., vs. HCRE Partners, LLC n/k/a NexPoint Real Estate  
Partners, LLC, Case No. 21-cv-01379-X

The Charitable DAF Fund LP et al v. Highland Capital Management LP, Case No. 3:21-  
cv- 01585-S

Dondero et al v. Highland Capital Management LP, Case No. 3:21-cv-01590-N

Charitable DAF Fund LP v. Highland Capital Management LP, Case No. 3:21-cv-01710-N

Highland Capital Management Fund Advisors L.P., and NexPoint Advisors, L.P. vs. Highland Capital Management, L.P., Case No. 3:21-cv-01895-D

The Charitable DAF Fund, L.P. et al v. Highland Capital Management LP, Case No. 3:21-cv-01974-X

Dondero et al v. Highland Capital Management LP, Case No. 3:21-cv-01979-S

The Dugaboy Investment Trust and Get Good Trust et al v. Highland Capital Management LP, Case No. 3:21-cv-02268-S

NextPoint Advisors, L.P. et al. vs. Pachulski Stang Ziehl & Jones LLP, Case No. 3:21-cv-03086-K

Highland Capital Management Fund Advisors, L.P., et al. vs. Highland Capital Management, L.P., Case No. 3:22-cv-02170-S (NDTX)

NexPoint Advisors LP, et al. vs. Highland Capital Management, L.P., Case No. 23-00573 (NDTX)

Charitable DAF Fund LP et al v. Highland Capital Management L.P., Case No. 3:23-cv-01503

Hunter Mountain Investment Trust v. Highland Capital Management, L.P., Case No. 3:23-cv-02071-E

James Dondero, et al., v. Highland Capital Management, L.P., Case No. 3:23-cv-00726-S

Dugaboy Investment Trust, et al. v. Highland Capital Management L.P., et al., Case No. 3:24-cv-01531-X

Hunter Mountain Investment Trust v. Highland Capital Management L.P., et al., Case No. 3:24-cv-01786-L

Hunter Mountain Investment Trust v. Highland Capital Management L.P., et al., Case No. 3:24-cv-01787-L



*Appellate Division of the Supreme Court  
of the State of New York  
First Judicial Department*

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*I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that*

*John Andrew Morris*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on February 26, 1991, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set my hand in the City of New York on June 26, 2024.*



*Susanna M. Rojas*  
Clerk of the Court



Supreme Court of the State of New York  
Appellate Division, First Department

DIANNE T. RENWICK  
PRESIDING JUSTICE

MARGARET SOWAH  
DEPUTY CLERK OF THE COURT

SUSANNA MOLINA ROJAS  
CLERK OF THE COURT

DOUGLAS C. SULLIVAN  
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the First Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

A handwritten signature in black ink, appearing to read 'Susanna M. Rojas', written in a cursive style.

Susanna Rojas  
Clerk of the Court

Revised October 2020