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Counsel for NexPoint Real Estate Partners, LLC (f/k/a HCRE Partners, LLC)

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

<p>In re:</p> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.,</p> <p style="text-align: center;">Reorganized Debtor.</p>	<p>Chapter 11</p> <p>Case No. 19-34054-sgj11</p>
<p>NEXPOINT REAL ESTATE PARTNERS, LLC (f/k/a HCRE PARTNERS, LLC),</p> <p style="text-align: center;">Appellant,</p> <p>v.</p> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.,</p> <p style="text-align: center;">Appellee.</p>	<p>Civil Case No. 3:24-cv-01479-BW</p>

**APPELLANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY**



I. BACKGROUND

1. Appellant NexPoint Real Estate Partners, LLC (f/k/a HCRE Partners, LLC) (“Appellant”) filed its Opening Brief on September 5, 2024, pursuant to the Federal Rules of Bankruptcy Procedure. Appellee Highland Capital Management, L.P.’s (“Appellee’s”) original deadline to file its Opening Brief was October 7, 2024.

2. On September 26, 2024, this Court granted Appellee’s motion for an extension of time to file its brief making the new deadline October 21, 2024. Appellee timely filed its brief. Pursuant to the Federal Rules of Bankruptcy Procedure, Appellant’s Reply Brief is currently due on November 4, 2024.

II. RELIEF REQUESTED

3. Appellant respectfully requests an 8-day extension of its deadline to file its Reply, making the new deadline to file November 12, 2024.

4. Good cause exists to grant the extension. Specifically, Appellant’s counsel has several other conflicting deadlines in the coming weeks, including multiple motions to dismiss due within days of the Reply Brief deadline, making it difficult to devote the required attention to drafting the Reply. Appellant’s counsel consists of two small firms with very small teams, which can make management of major competing deadlines challenging. The requested extension is not sought to delay the proceeding, nor will it prejudice the Appellee in any manner.

5. For the foregoing reasons, Appellant respectfully requests the Court extend the deadline for Appellant to file its reply from November 4, 2024, to November 12, 2024.

6. As indicated by the certificate of conference below Appellee is unopposed to the requested extension.

III. CONCLUSION

WHEREFORE, NexPoint Real Estate Partners, LLC (f/k/a HCRE Partners, LLC) respectfully requests that the Court enter an order (i) granting the Motion, (ii) extending the deadline for Appellant to file its Reply from November 4, 2024, to November 12, 2024, and (iii) granting Appellant such additional relief as may be just and proper.

Dated: October 29, 2024

Respectfully submitted,

/s/ Amy L. Ruhland

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on October 29, 2024, counsel for Appellant, Amy Ruhland, spoke with counsel for Appellee, John Morris, regarding the requested relief. Mr. Morris indicated that the Appellee is unopposed to the relief requested in the Motion.

/s/ Amy L. Ruhland

Amy L. Ruhland

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 29, 2024, a true and correct copy of this document was served electronically via the Court's CM/ECF system to the parties registered or otherwise entitled to receive electronic notices in this case.

/s/ Amy L. Ruhland

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v.	Civil Case No. 3:24-cv-01479-BW
HIGHLAND CAPITAL MANAGEMENT, L.P., Appellee.	

**PROPOSED ORDER GRANTING UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE REPLY**

