

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

<p>In re:</p> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.,<sup>1</sup></p> <p>Reorganized Debtor.</p> <hr/> <p>MARC S. KIRSCHNER, AS LITIGATION TRUSTEE OF THE LITIGATION SUB-TRUST,</p> <p>Plaintiff,</p> <p>v.</p> <p>JAMES D. DONDERO; SCOTT ELLINGTON; ISAAC LEVENTON; GRANT JAMES SCOTT III; STRAND ADVISORS, INC.; NEXPOINT ADVISORS, L.P.; HIGHLAND CAPITAL MANAGEMENT FUND ADVISORS, L.P.; DUGABOY INVESTMENT TRUST AND NANCY DONDERO, AS TRUSTEE OF DUGABOY INVESTMENT TRUST; GET GOOD TRUST AND GRANT JAMES SCOTT III, AS TRUSTEE OF GET GOOD TRUST; HUNTER MOUNTAIN INVESTMENT TRUST; CLO HOLDCO, LTD.; CHARITABLE DAF HOLDCO, LTD.; CHARITABLE DAF FUND, LP.; HIGHLAND DALLAS FOUNDATION; RAND PE FUND I, LP, SERIES 1; MASSAND CAPITAL, LLC; MASSAND CAPITAL, INC.; AND SAS ASSET RECOVERY, LTD.</p> <p>Defendants.</p>
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Chapter 11  
Case No. 19-34054-sgj11

Adv. Pro. No. 21-03076-sgj

**UNOPPOSED MOTION TO WITHDRAW AS ATTORNEY**

Marc S. Kirschner, as Litigation Trustee of the Highland Litigation Sub-Trust (the “Litigation Trustee”), respectfully requests that this Court enter an order permitting Aaron Lawrence of Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”) to withdraw as an attorney of record in the above-captioned adversary proceeding. Mr. Lawrence is leaving the Quinn Emanuel firm. This motion does not affect and is not intended to affect the appearance of

<sup>1</sup> The last four digits of the Reorganized Debtor’s taxpayer identification number are (8357). The Reorganized Debtor is a Delaware limited partnership. The Reorganized Debtor’s headquarters and service address are 100 Crescent Court, Suite 1850, Dallas, TX 75201.



the other attorneys of record at Quinn Emanuel who have appeared on behalf of Quinn Emanuel clients. The Litigation Trustee will continue to be represented by counsel of record from Quinn Emanuel Urquhart & Sullivan, LLP and Sidley Austin LLP. Therefore, the Litigation Trustee respectfully requests that Mr. Lawrence be permitted to withdraw as an attorney of record.

Dated: January 13, 2025

Respectfully submitted,

/s/ Paige Holden Montgomery

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*Counsel for Marc S. Kirschner, as Litigation  
Trustee of the Highland Litigation Sub-Trust*

**CERTIFICATE OF CONFERENCE**

I hereby certify that on or about January 8 and 13, 2025, counsel for the Litigation Trustee conferred with counsel for Highland Capital Management L.P. and James A. Dondero regarding the relief sought in this Motion. Counsel indicated that they are unopposed to the relief sought in this Motion.

/s/ Paige Holden Montgomery  
Paige Holden Montgomery

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was sent via electronic mail via the Court's ECF system to all parties authorized to receive electronic notice in this case on January 13, 2025.

/s/ Paige Holden Montgomery  
Paige Holden Montgomery

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,<sup>1</sup>

Reorganized Debtor.

MARC S. KIRSCHNER, AS LITIGATION TRUSTEE  
OF THE LITIGATION SUB-TRUST,

Plaintiff,

v.

JAMES D. DONDERO; SCOTT ELLINGTON; ISAAC  
LEVENTON; GRANT JAMES SCOTT III; STRAND  
ADVISORS, INC.; NEXPOINT ADVISORS, L.P.;  
HIGHLAND CAPITAL MANAGEMENT FUND  
ADVISORS, L.P.; DUGABOY INVESTMENT TRUST  
AND NANCY DONDERO, AS TRUSTEE OF  
DUGABOY INVESTMENT TRUST; GET GOOD  
TRUST AND GRANT JAMES SCOTT III, AS  
TRUSTEE OF GET GOOD TRUST; HUNTER  
MOUNTAIN INVESTMENT TRUST; CLO HOLDCO,  
LTD.; CHARITABLE DAF HOLDCO, LTD.;  
CHARITABLE DAF FUND, LP.; HIGHLAND  
DALLAS FOUNDATION; RAND PE FUND I, LP,  
SERIES 1; MASSAND CAPITAL, LLC; MASSAND

Chapter 11

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

CAPITAL, INC.; AND SAS ASSET RECOVERY,  
LTD.

Defendants.

**ORDER GRANTING UNOPPOSED MOTION TO  
WITHDRAW AS ATTORNEY**

On this date, the Court considered the Unopposed Motion to Withdraw as Attorney (the “Motion”) by Aaron Lawrence of Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), requesting that this Court authorize him to withdraw as counsel for Marc S. Kirschner, as Litigation Trustee of the Highland Litigation Sub-Trust (the “Litigation Trustee”) in the above-captioned adversary proceeding. Upon consideration of the Motion and the fact that this Motion is unopposed, the Court finds that the Motion is well taken and should be granted. Accordingly, the Court finds that just cause exists for entry of the following order. It is therefore **ORDERED** as follows:

1. The Motion is hereby **GRANTED**.
2. Mr. Lawrence is permitted to withdraw as counsel for the Litigation Trustee in the above-captioned adversary proceeding and is deemed withdrawn effective as of the entry of this Order.
3. The Clerk of this Court and all parties are directed to remove Mr. Lawrence as an attorney of record for the Litigation Trustee on the docket in this adversary proceeding and any applicable service list.
4. The withdrawal effectuated by this Order does not impact Quinn Emanuel or Sidley Austin LLP’s representation of the Litigation Trustee in the main bankruptcy case or any other adversary proceeding.

### End of Order ###