Docket #4725 Date Filed: 08/19/2026

PACHULSKI STANG ZIEHL & JONES LLP
Jeffrey N. Pomerantz (admitted *pro hac vice*)
John A. Morris (admitted *pro hac vice*)
Gregory V. Demo (admitted *pro hac vice*)
Jordan A. Kroop (admitted *pro hac vice*)
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Tel: (310) 277-6910
Fax: (310) 201-0760

HAYWARD PLLC
Melissa S. Hayward
Texas Bar No. 24044908
MHayward@HaywardFirm.com
Zachery Z. Annable
Texas Bar No. 24053075
ZAnnable@HaywardFirm.com
10501 N. Central Expwy., Ste. 106
Dallas, TX 75231
Tel: (972) 755-7100
Fax: (972) 755-7110

Counsel for Highland Litigation Trustee, LLC,
as Litigation Trustee of the Highland Litigation Sub-Trust

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

In re:	)	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P.,[1]	)	Case No. 19-34054-sgj11
Reorganized Debtor.	)	

MOTION TO SUBSTITUTE COUNSEL

[1] Highland's last four digits of its taxpayer identification number are (8357). The service address for Highland is 6333 E. Mockingbird Lane, Suite 147 #5045, Dallas, TX 75214.

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The Highland Litigation Sub-Trust (the "Litigation Sub-Trust"), a party-in-interest in the above-captioned chapter 11 bankruptcy case (the "Bankruptcy Case") of Highland Capital Management, L.P. ("Highland"), files this motion (the "Motion") respectfully requesting that the Court enter an order, substantially in the form attached as **Exhibit A** hereto (the "Proposed Order"), permitting the Litigation Sub-Trust to substitute counsel in the Bankruptcy Case. In support of the Motion, the Litigation Sub-Trust respectfully states the following:

1. The Litigation Sub-Trust was formed under the confirmed and effective *Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified)* [Docket No. 1808].

2. Mark S. Kirschner was the original litigation trustee (the "Original Trustee") of the Litigation Sub-Trust. The Original Trustee retained (i) Robert S. Loigman, Deborah J. Newman, and the law firm of Quinn Emanuel Urquhart & Sullivan LLP (together, the "Quinn Attorneys") and (ii) Paige H. Montgomery and the law firm of Sidley Austin LLP (together, the "Sidley Attorneys") to represent the Litigation Sub-Trust.

3. Highland Litigation Trustee, LLC (the "Successor Trustee") has since replaced the Original Trustee as the litigation trustee of the Litigation Sub-Trust. The Successor Trustee retained (i) Jeffrey N. Pomerantz, John A. Morris, Gregory V. Demo, Jordan A. Kroop, and the law firm of Pachulski, Stang, Ziehl & Jones LLP (together, the "Pachulski Attorneys") and (ii) Melissa S. Hayward, Zachery Z. Annable, and the law firm of Hayward PLLC (together, the "Hayward Attorneys") to represent the Litigation Sub-Trust.

4. Through this Motion, the Litigation Sub-Trust seeks to substitute the Pachulski Attorneys and the Hayward Attorneys as its counsel of record in the Bankruptcy Case.

5. The Litigation Sub-Trust further requests that, upon approval of the substitution of the Pachulski Attorneys and the Hayward Attorneys as its counsel in the Bankruptcy Case, the Court deem the Quinn Attorneys and the Sidley Attorneys withdrawn as counsel for the Litigation Sub-Trust in the Bankruptcy Case.

6. Per the certificate of conference attached to this Motion, the Quinn Attorneys and the Sidley Attorneys are unopposed to the relief requested herein.

WHEREFORE, the Litigation Sub-Trust respectfully requests that the Court enter the Proposed Order (i) granting the Motion, (ii) substituting the Pachulski Attorneys and the Hayward Attorneys as counsel for the Litigation Sub-Trust in the Bankruptcy Case, (iii) deeming the Quinn Attorneys and the Sidley Attorneys withdrawn as counsel for the Litigation Sub-Trust in the Bankruptcy Case, and (iv) granting the Litigation Sub-Trust such further and additional relief as the Court deems necessary and appropriate.

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Dated: August 19, 2026

PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (admitted *pro hac vice*)
John A. Morris (admitted *pro hac vice*)
Gregory V. Demo (admitted *pro hac vice*)
Jordan A. Kroop (admitted *pro hac vice*)
10100 Santa Monica Boulevard, 13th Floor
Los Angeles, CA 90067
Tel: (310) 277-6910
Fax: (310) 201-0760
Email: jpomerantz@pszjlaw.com
jmorris@pszjlaw.com
gdemo@pszjlaw.com
jkroop@pszjlaw.com

-and-

HAYWARD PLLC

/s/ Zachery Z. Annable
Melissa S. Hayward
Texas Bar No. 24044908
MHayward@HaywardFirm.com
Zachery Z. Annable
Texas Bar No. 24053075
ZAnnable@HaywardFirm.com
10501 N. Central Expwy., Ste. 106
Dallas, TX 75231
Tel: (972) 755-7100
Fax: (972) 755-7110

Counsel for Highland Litigation Trustee, LLC,
as Litigation Trustee of the
Highland Litigation Sub-Trust

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that, on August 18 and 19, 2026, Zachery Z. Annable, counsel for the Litigation Sub-Trust, corresponded with Robert S. Loigman of Quinn Emanuel Urquhart & Sullivan LLP and Sophie Green of Sidley Austin LLP regarding the relief requested in the foregoing Motion. Mr. Loigman indicated that the Quinn Attorneys are **UNOPPOSED** to the relief requested in the Motion. Ms. Green indicated that the Sidley Attorneys are likewise **UNOPPOSED** to the relief requested in the Motion.

/s/ Zachery Z. Annable
Zachery Z. Annable

EXHIBIT A

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

In re:	)	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P.,[1]	)	Case No. 19-34054-sgj11
Reorganized Debtor.	)	

ORDER GRANTING
MOTION TO SUBSTITUTE COUNSEL

Upon consideration of the *Motion to Substitute Counsel* (the "Motion")[2] filed by the Highland Litigation Sub-Trust (the "Litigation Sub-Trust"), a party-in-interest in the above-captioned chapter 11 bankruptcy case (the "Bankruptcy Case") of Highland Capital Management, L.P., the Court finds and concludes that the factual and legal bases set forth in the Motion establish sufficient cause for the relief granted in this Order; therefore, after due deliberation, **IT IS ORDERED, ADJUDGED, AND DECREED THAT**:

[1] Highland's last four digits of its taxpayer identification number are (8357). The service address for Highland is 6333 E. Mockingbird Lane, Suite 147 #5045, Dallas, TX 75214.

[2] Capitalized terms not otherwise defined in this Order shall have the meanings ascribed to them in the Motion.

1. The Motion is **GRANTED** as set forth herein.

2. Effective upon the entry of this Order, (i) Jeffrey N. Pomerantz, John A. Morris, Gregory V. Demo, Jordan A. Kroop, and the law firm of Pachulski, Stang, Ziehl & Jones LLP and (ii) Melissa S. Hayward, Zachery Z. Annable, and the law firm of Hayward PLLC are substituted as counsel of record for the Litigation Sub-Trust in the Bankruptcy Case.

3. Effective upon the entry of this Order, (i) Robert S. Loigman, Deborah J. Newman, and the law firm of Quinn Emanuel Urquhart & Sullivan LLP (together, the "Quinn Attorneys") and (ii) Paige H. Montgomery and the law firm of Sidley Austin LLP (together, the "Sidley Attorneys") are hereby withdrawn as counsel of record for the Litigation Sub-Trust in the Bankruptcy Case.

4. The Clerk of this Court and all parties are directed to remove the Quinn Attorneys and the Sidley Attorneys as counsel of record for the Litigation Sub-Trust on the docket and any applicable service list, including the Court's CM/ECF electronic notification list, maintained in the Bankruptcy Case.

5. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

###End of Order###