

Gregory G. Hesse, Esq.  
State Bar No. 09549419  
HUNTON ANDREWS KURTH, LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202-2799  
Telephone: (214) 979-3000  
Telecopy: (214) 880-0011

**ATTORNEYS FOR DUGABOY INVESTMENT TRUST**

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

In re:	§	
	§	Chapter 11
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.	§	Case No. 19-34054-sgj-11
	§	
Reorganized Debtor.	§	
	§	

**EMERGENCY MOTION FOR AN ORDER EXTENDING DURATION OF  
TIME TO RESPOND TO TRUSTS' MOTION**

COMES NOW, Gregory G. Hesse of Hunton Andrews Kurth, LLP, recently retained counsel for The Dugaboy Investment Trust ("Dugaboy"), and respectfully files this Emergency Motion to request the Court for entry of an order extending the duration of time to respond to the Trusts' *Motion for Entry of an Order Pursuant to Bankruptcy Rule 9019 and 11 U.S.C. § 363 Approving Settlement with the HMIT Entities and Authorizing Actions Consistent Therewith* [Docket No. 4216] (the "9019 Motion"), and in support, states as follows:

1. Counsel was formally retained on June 6, 2025 to represent Dugaboy in the above-captioned matter. Given the recent engagement, counsel requires additional time to review the motion pending before the court, and prepare a meaningful and informed response to the 9019 Motion, which was filed on May 19, 2025.

2. The current deadline for Dugaboy to file a response is June 9, 2025.



3. At about 3 pm on June 6, 2025, counsel contacted counsel for the Highland Capital Management, L.P., and the Highland Claimant Trust (“HCMLP”) requesting a two-week extension to file a response. Counsel for HCMLP not only did not consent to the requested extension, but also alleged that Hunton has a conflict of interest and that HCMLP will not consent to Hunton representing Dugaboy in this matter. At this time, Hunton is evaluating the allegations of HCMLP as to whether it in fact has a conflict, however, absent an extension, Dugaboy is at risk of not having counsel to timely file a response to the Motion.

4. Counsel respectfully requests an extension of 14 days, up to and including June 23, 2025, to respond to the 9019 Motion.

5. This request is made in good faith and not for the purpose of delay. The extension is necessary to ensure adequate representation and to allow counsel to become sufficiently familiar with the case. Granting this request will not prejudice any party, and no deadlines other than the response date will be affected. However, denying this request may prejudice Dugaboy’s ability to participate fully in the proceedings concerning the 9019 Motion.

WHEREFORE, Dugaboy requests an extension of time to respond to the 9019 Motion through and including June 23, 2025.

**DATED:** June 9, 2025

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

By: /s/ Gregory G. Hesse  
Gregory G. Hesse (Texas Bar No.09549419)  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202-2799  
Telephone: (214) 979-3000  
Telecopy: (214) 880-0011  
[GHesse@hunton.com](mailto:GHesse@hunton.com)

**ATTORNEYS FOR DUGABOY INVESTMENT  
TRUST**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 9<sup>th</sup> day of June, 2025, a true and correct copy of the foregoing was served on ECF participants, electronically through the Court's ECF System.

/s/ Gregory G. Hesse

Gregory G. Hesse

**CERTIFICATE OF CONFERENCE**

On June 6, 2025, Counsel for Dugaboy Investment Trust contacted counsel for the Highland Entities about the requested extension. The Highland Entities oppose the relief requested.

/s/ Gregory G. Hesse

Gregory G. Hesse

Gregory G. Hesse, Esq.  
State Bar No. 09549419  
HUNTON ANDREWS KURTH, LLP  
1445 Ross Avenue, Suite 3700  
Dallas, Texas 75202-2799  
Telephone: (214) 979-3000  
Telecopy: (214) 880-0011

**ATTORNEYS FOR DUGABOY INVESTMENT TRUST**

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

In re:	§	
	§	Chapter 11
	§	
HIGHLAND CAPITAL MANAGEMENT, L.P.	§	Case No. 19-34054-sgj-11
	§	
Reorganized Debtor.	§	
	§	

**ORDER GRANTING THE DUGABOY INVESTMENT TRUST’S EMERGENCY  
MOTION FOR AN ORDER EXTENDING DURATION OF TIME TO RESPOND TO  
TRUSTS’ MOTION**

Having considered (a) the Emergency Motion for an Order Extending Duration of Time to Respond to the Trusts’ *Motion for Entry of an Order Pursuant to Bankruptcy Rule 9019 and 11 U.S.C. § 363 Approving Settlement with the HMIT Entities and Authorizing Actions Consistent Therewith* [Docket No. 4216] (the “9019 Motion”) filed by The Dugaboy Investment Trust (“Dugaboy”); and (b) all prior proceedings related to this matter; and this Court having found that good cause exists to expedite consideration of the requested relief, it is **HEREBY ORDERED THAT:**

1. That the Emergency Motion is **GRANTED**.
2. That Dugaboy shall have through and including June 23, 2025 to file its response to the 9019 Motion.

3. All other deadlines and requirements concerning the 9019 Motion remain unaffected by this Order.

4. The Court shall retain exclusive jurisdiction with respect to all matters arising from or relating to the implementation, interpretation, and enforcement of this Order.

**### End of Order ###**