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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.	§	
	§	

**MOTION FOR EXPEDITED HEARING ON 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”), respectfully files this Motion for Expedited Hearing on its 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”), and respectfully states as follows:

1. Dugaboy only formally retained undersigned counsel on June 6, 2025, just days before the current response deadline.
2. Counsel requires additional time to meaningfully review the 9019 Motion and prepare an informed response.



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. Without an expedited hearing and ruling, Dugaboy faces significant prejudice, including the potential inability to respond to the 9019 Motion through counsel of its choosing.

5. Given the circumstances, Dugaboy respectfully requests that the Court grant this Motion for Expedited Hearing to allow the Extension Motion to be heard and decided immediately or as soon thereafter as practicable.

WHEREFORE, Dugaboy respectfully requests that the Court (i) grant this Motion for Expedited Hearing; (ii) set an expedited hearing on the Emergency Motion to Extend time to Respond to the 9019 Motion or otherwise rule on the Extension Motion on an expedited basis; and (iii) grant such other and further relief to which Dugaboy may be entitled.

DATED: June 9, 2025

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

By: /s/ Gregory G. Hesse
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TRUST**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 9th 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

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**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 MOTION FOR EXPEDITED HEARING ON EMERGENCY MOTION FOR AN ORDER EXTENDING DURATION OF TIME TO RESPOND TO TRUSTS’ MOTION

Having considered (a) the Motion for Expedited Hearing (the “Motion”) filed by The Dugaboy Investment Trust (“Dugaboy”), seeking expedited consideration of its 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”); 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. The Motion for Expedited Hearing is **GRANTED** as set forth herein.

2. An expedited hearing on the Emergency Motion for an Order Extending Duration of Time to Respond to the 9019 Motion shall be held on _____, 2025 at _____ .m. (Central Time).

3. Dugaboy shall serve a copy of this Order on all required parties and file a certificate of service promptly thereafter.

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