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**COUNSEL FOR THE HMIT ENTITIES**

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

<b>In re:</b>	§	
	§	
<b>HIGHLAND CAPITAL</b>	§	<b>Case No. 19-34054-sgj11</b>
<b>MANAGEMENT, L.P.</b>	§	
	§	
<b>Reorganized Debtor.</b>	§	

**HMIT ENTITIES JOINDER TO MOTION TO QUASH SUBPOENAS SERVED BY  
PATRICK DAUGHERTY**

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Hunter Mountain Investment Trust (“HMIT”), Beacon Mountain LLC (“Beacon Mountain”), Rand Advisors, LLC (“Rand Advisors”), Rand PE Fund I, LP (“Rand PE Fund”), Rand PE Fund Management, LLC (“Rand GP”), Atlas IDF, LP (“Atlas IDF”), and Atlas IDF GP, LLC (“Atlas GP” and together with HMIT, Beacon Mountain, Rand Advisors, Rand PE Fund, Rand GP, and Atlas IDF, the “HMIT Entities”) file this *Joinder* to the *Motion to Quash Subpoenas Served by Patrick Daugherty* [Dkt. No. 4248] (the “Motion to Quash”) filed by Highland Capital Management, L.P., the reorganized debtor (“Highland”) in the above-captioned chapter 11 case



(the “Bankruptcy Case”) and the Highland Claimant Trust (the “Claimant Trust”). For the reasons set forth in the Motion to Quash, the HMIT Entities move pursuant to Federal Rule of Civil Procedure (“FRCP”) 45(d), made applicable herein pursuant to Federal Rule of Bankruptcy Procedure (“Bankruptcy Rule”) 9016, to quash the subpoenas served by Patrick Daugherty (“Daugherty”) directed to (i) James P. Seery, Jr. (the “Seery Subpoena”), (ii) Mark Patrick (the “Patrick Subpoena”), and (iii) Highland’s corporate representative (the “Rule 30(b)(6) Subpoena,” and collectively with the Seery Subpoena and Patrick Subpoena, the “Subpoenas”).

Respectfully Submitted:

**KELLY HART PITRE**

/s/ Louis M. Phillips  
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***Counsel for the HMIT Entities***

**CERTIFICATE OF SERVICE**

I, undersigned counsel, hereby certify that a copy of the forgoing was served on all parties receiving notice in this chapter 11 case through this Court’s CM/ECF System on this June 20, 2025.

/s/ Louis M. Phillips  
Louis M. Phillips (#10505)