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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
	§	
Debtor.	§	
	§	

**MOTION OF VARTABEDIAN, HESTER & HAYNES LLP TO WITHDRAW AS
COUNSEL FOR ACIS CAPITAL MANAGEMENT, L.P. AND ACIS CAPITAL
MANAGEMENT GP, LLC**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS
A WRITTEN RESPONSE IS FILED WITH THE CLERK OF
THE UNITED STATES BANKRUPTCY COURT AT 1100
COMMERCE ST., RM. 1254 DALLAS, TX 75242-1496
BEFORE CLOSE OF BUSINESS ON JULY 15, 2025, WHICH
IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE
HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED
WITH THE CLERK, AND A COPY SHALL BE SERVED
UPON COUNSEL FOR THE MOVING PARTY PRIOR TO
THE DATE AND TIME SET FORTH HEREIN. IF A
RESPONSE IS FILED A HEARING MAY BE HELD WITH
NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS
TIMELY REQUESTED, THE RELIEF REQUESTED SHALL
BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY**



**ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR
THE NOTICED ACTION MAY BE TAKEN.**

Vartabedian, Hester & Haynes LLP (“VHH”) files this *Motion of Vartabedian, Hester & Haynes LLP to Withdraw as Counsel for Acis Capital Management, L.P. and Acis Capital Management GP, LLC* (the “Motion”), seeking to withdraw as counsel for Acis Capital Management, L.P. and Acis Capital Management GP, LLC (collectively, “Acis”), creditors in the above-styled bankruptcy case (the “Bankruptcy Case”). VHH shows the Court as follows:

1. VHH requests permission to withdraw from representing Acis in this Bankruptcy Case.¹ Acis consents to the withdrawal. Acis will continue to be represented by Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing P.C. (“AZA”).

2. “An attorney may withdraw from representation only upon leave of the court and a showing of good cause and reasonable notice to the client.” *Wynn v. Eriksson*, 889 F.2d 644, 646 (5th Cir. 1989). The withdrawing attorney bears the burden of proving the existence of good cause for withdrawal. *See Federal Trade Commission v. Intellipay, Inc.*, 828 F. Supp. 33, 34 (S.D. Tex. 1993).

3. Local Bankruptcy Rule 2091-1 requires a motion to withdraw to specify the reasons requiring withdrawal and provide the name and address of the succeeding attorney(s).

4. Cause exists for permitting VHH to withdraw. Specifically, Acis will continue to be represented in this bankruptcy case by AZA. Additionally, based on conversations between VHH and Acis, Acis no longer desires any further services from VHH in this Bankruptcy Case.

5. AZA’s office address, telephone number, fax number, and email address are as follows:

¹ On January 1, 2025, Forshey Prostok, LLP (“FP”) merged into VHH. Although VHH has never formally appeared in the case as counsel for Acis, certain attorneys now at VHH previously entered an appearance for Acis while with FP.

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6. This Motion is not sought for the purposes of delay.

7. Accordingly, the undersigned counsel seeks leave to withdraw as counsel to Acis in this Bankruptcy Case.

WHEREFORE, VHH respectfully requests this Court to (i) grant this Motion; (ii) permit VHH to withdraw as counsel to Acis in this Bankruptcy Case; and (iii) grant VHH such other and further relief to which it may be justly entitled, both at law and equity.

Dated: June 24, 2025

Respectfully submitted,

/s/ Jeff P. Prostok
Jeff P. Prostok
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Counsel for Acis

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served via the Court's ECF system on all parties authorized to receive electronic notice in this case on this 24th day of June 2025.

/s/ Jeff P. Prostok
Jeff P. Prostok

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

In re:

**HIGHLAND CAPITAL MANAGEMENT,
L.P.,**

Debtor.

§
§
§
§
§
§
§

Chapter 11

Case No. 19-34054-SGJ

**ORDER GRANTING UNOPPOSED MOTION OF VARTABEDIAN, HESTER &
HAYNES LLP TO WITHDRAW AS COUNSEL FOR ACIS CAPITAL MANAGEMENT,
L.P. AND ACIS CAPITAL MANAGEMENT GP, LLC**

Came for consideration the *Motion of Vartabedian, Hester & Haynes LLP to Withdraw as Counsel for Acis Capital Management L.P. and Capital Management GP, LLC* (the “Motion”), filed by Vartabedian, Hester & Haynes LLP (“VHH”) in the above-captioned bankruptcy proceeding (the “Bankruptcy Case”). The Court, having jurisdiction to consider the Motion and

the relief requested therein, finds that proper notice of the Motion has been provided, and good cause exists to permit VHH to withdraw as counsel for Acis Capital Management, L.P. and Acis Capital Management GP, LLC (collectively, "Acis").

Therefore, it is hereby:

ORDERED that the Motion is **GRANTED**; it is further

ORDERED that VHH is permitted to withdraw as counsel for Acis in the Bankruptcy Case; and it is further

ORDERED that the Clerk of this Court and all parties are directed to remove VHH as attorneys for Acis on the docket and any applicable service list, including the Court's CM/ECF electronic notification list, maintained in the Bankruptcy Case.

END OF ORDER

SUBMITTED BY:

/s/ Jeff P. Prostok

Jeff P. Prostok

State Bar No. 16352500

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State Bar No. 07264200

Suzanne K. Rosen

State Bar No. 00798518

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COUNSEL FOR ACIS