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Counsel for The Dugaboy Investment Trust

**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)

**AGREED JOINT MOTION TO EXTEND BRIEFING AND HEARING DATES FOR
DUGABOY'S MOTION FOR RELIEF FROM ORDER
AND MOTION TO VACATE (DKT. 4513)**

Interested Party The Dugaboy Investment Trust ("Dugaboy") and Reorganized Debtor Highland Capital Management L.P. and the Highland Claimant Trust ("Highland Entities" or "Highland") (collectively, "the Parties") respectfully ask the Court to extend the briefing deadlines



and hearing date for Dugaboy's Motion for Relief from Order and Motion to Vacate ("Motion for Relief") (Dkt. 4513).

Background

1. On October 6, 2019, Highland Capital Management, L.P. ("Highland" or the "Debtor") commenced the above-captioned bankruptcy case in the District of Delaware, which was subsequently transferred to this Court. On February 22, 2021, this Court entered the Order (I) Confirming the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified) and (II) Granting Relief [Dkt. No. 1943], which confirmed the Fifth Amended Plan of Reorganization of Highland Capital Management, L.P. (as Modified) [Dkt. No. 1943-1] (the "Plan"). The Plan became effective on August 11, 2021 [Dkt. No. 2700] (the "Effective Date").

2. On June 30, 2025, this Court entered its Order Pursuant to Bankruptcy Rule 9019 and 11 U.S.C. § 363 Approving Settlement Between the Highland Entities and the HMIT Entities and Authorizing Actions Consistent Therewith [Dkt. No. 4297] (the "Rule 9019 Settlement Order").

3. On July 14, 2025, Dugaboy filed a Notice of Appeal of the Rule 9019 Settlement Order [Dkt. No. 4311]. That appeal remains pending before the United States District Court for the Northern District of Texas (Case No. 3:25-cv-01876-K).

4. On February 9, 2026, Dugaboy Filed its Motion for Relief from Order and Motion to Vacate [Docket 4513] (the "Motion for Relief") in this Court, seeking reconsideration of the Rule 9019 Settlement Order pursuant to Federal Rule of Civil Procedure 60(b) and Federal Rule of Bankruptcy Procedure 9024.

5. On February 13, 2026, this Court issued an Order (Dkt. 4515) setting the current operative deadlines for the Motion for Relief as follows:

- a. Highland's Opposition is due March 2, 2026.
- b. Dugaboy's Reply is due March 9, 2026.
- c. The Hearing is set for March 12, 2026 at 10:00 a.m. via WebEx.

Bases for Requested Relief

6. The Parties jointly request that the Court vacate the existing deadlines and adopt the proposed schedule detailed below.

7. Good cause under Federal Rule of Bankruptcy Procedure 9006(b)(1)(A) exists for the requested scheduling postponement for multiple reasons.

8. First, the Parties are filing this request before any current deadlines have expired. *See* Rule 9006(b)(1)(A).

9. Second, Highland has requested a 30-day extension on the deadline for its Opposition due to its lead counsel's travel plans and other professional commitments, and Dugaboy has agreed not to oppose that request.

10. Third, both Parties need additional time to serve targeted written discovery and depose witnesses in advance of the hearing on Dugaboy's Motion for Relief, subject to Highland's reservation of the right to object to any and all discovery in connection with the Motion for relief.

11. Both Dugaboy and the Highland Entities have agreed to join this Agreed Joint Motion subject to each party reserving its rights to object to any depositions or written discovery sought by the other party (the "Reservation of Rights").

Proposed Schedule

12. The proposed schedule jointly requested by the Parties is as follows:

- a. Highland's Opposition will be due April 3, 2026.
- b. All discovery is subject to the Reservation of Rights.

- c. The Parties shall disclose any witnesses they intend to call by April 6, 2026.
 - i. To the extent not prohibited by Court order, each side may take the depositions of up to three witnesses. Of those, each party is allowed one deposition of eight hours and two other depositions of four hours each.
 - ii. Depositions shall be completed during the week of April 6–10, 2026, but the Parties may continue depositions into the following week of April 13–17, 2026, if needed.
- d. Dugaboy’s Reply will be due April 24, 2026.
- e. The Hearing shall be set for a one-day hearing on a date convenient to the Court during the time period from April 27, 2026 to May 8, 2026.
 - i. The deadlines for filing lists of exhibits and witnesses and serving exhibits shall be seven (7) days before the hearing date.

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WHEREFORE, the Parties respectfully request entry of the order substantially in the form attached to this Motion, granting the relief requested herein and such further and other relief as the Court deems appropriate.

Dated: March 2, 2026

WINSTON & STRAWN LLP

/s/ John Michael Gaddis

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*Counsel for Highland Capital Management, L.P. and the
Highland Claimant Trust*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 2, 2026, a true and correct copy of this document was served electronically via the Court's CM/ECF system to the parties registered or otherwise entitled to receive electronic notices in this case.

/s/ John Michael Gaddis

John Michael Gaddis

CERTIFICATE OF CONFERENCE

Pursuant to Local Bankruptcy Rule 7007-1(b), I certify that during the week leading up to March 2, 2026, I exchanged multiple emails with John Morris, counsel for the Highland Entities, and was informed that the Highland Entities agree to join this Agreed Joint Motion subject to each party reserving its rights to object to witnesses or discovery.

/s/ John Michael Gaddis

John Michael Gaddis

Exhibit A

Proposed Order

**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-sjg11

**[PROPOSED] ORDER GRANTING AGREED JOINT MOTION TO EXTEND
BRIEFING AND HEARING DATES FOR DUGABOY'S
MOTION FOR RELIEF FROM ORDER AND MOTION TO VACATE (DKT. 4513)**

Upon the Agreed Joint Motion of The Dugaboy Investment Trust (“Dugaboy”) and Highland Capital Management, L.P. (the “Highland Entities” or “Highland”) (together, “the Parties”) to Extend Briefing and Hearing Dates for Dugaboy’s Motion for Relief from Order and Motion to Vacate (Dkt. 4513) (the “Motion”), the Court finds that the Motion is well-taken and its requested relief is proper, and after due deliberation and sufficient cause appearing therefor, it is ORDERED THAT:

1. The Motion is granted as set forth herein.
2. Highland’s Opposition to the Motion for Relief is due April 3, 2026.
3. All discovery is subject to the Parties’ respective reservation of the right to object to any depositions or written discovery sought by the other party.
4. The Parties shall disclose their respective witnesses by April 6, 2026.
5. To the extent not prohibited by Court order, each party is allowed to depose three witnesses, of which one witness may be deposed up to eight (8) hours and the other two witnesses up to four (4) hours.
6. Depositions shall be completed during the week of April 6–10, 2026, but the Parties may agree to extend depositions into the week of April 13–17 if necessary.
7. Dugaboy’s Reply is due April 24, 2026.
8. The Hearing on the Motion for Relief shall be set for a one-day hearing at a date convenient to the Court during the time period from April 27, 2026, and May 8, 2026.
9. The Parties must file and serve witness and exhibit lists, and exchange exhibits, no later than seven (7) days before the Hearing Date.

END OF ORDER

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