

PACHULSKI STANG ZIEHL & JONES LLP
Jeffrey N. Pomerantz (CA Bar No.143717)
Ira D. Kharasch (CA Bar No. 109084)
John A. Morris (NY Bar No. 266326)
Gregory V. Demo (NY Bar No. 5371992)
Hayley R. Winograd (NY Bar No. 5612569)
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Telephone: (310) 277-6910
Facsimile: (310) 201-0760

HAYWARD PLLC
Melissa S. Hayward
Texas Bar No. 24044908
MHayward@HaywardFirm.com
Zachery Z. Annable
Texas Bar No. 24053075
ZAnnable@HaywardFirm.com
10501 N. Central Expy, Ste. 106
Dallas, Texas 75231
Tel: (972) 755-7100
Fax: (972) 755-7110

Counsel for Highland Capital Management, L.P.

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

In re:	§	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹	§	Case No. 19-34054-sgj11
Debtor.	§	
In re:	§	
JAMES DONDERO, <i>et al.</i> ,	§	
Appellants,	§	
v.	§	
HON. STACEY G. C. JERNIGAN.,	§	Case No. 3:21-cv-00879-K
Appellee.	§	

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.



**DEBTOR’S RESPONSE TO APPELLANTS’
MOTION FOR EXPEDITED APPEAL**

Highland Capital Management, L.P., the debtor and debtor-in-possession (the “Debtor”) in the above-captioned chapter 11 case (“Bankruptcy Case”) and an intervenor in the above-captioned appeal (the “Appeal”), by and through its undersigned counsel, hereby files this response (the “Response”) to *Appellants’ Motion for Expedited Appeal* [Docket No. 12]² (the “Motion”) filed by James Dondero, Highland Capital Management Fund Advisors, L.P., NexPoint Advisors, L.P., The Dugaboy Investment Trust, The Get Good Trust, and NexPoint Real Estate Partners, LLC, f/k/a HCRE Partners, LLC (collectively, “Appellants”).

The Debtor welcomes the expediting of this Appeal so this Court can promptly put an end to the latest in a long line of frivolous positions Appellants have taken throughout the Bankruptcy Case. The Debtor is confident that upon a review of the record, this Court will conclude that the Bankruptcy Court’s series of rulings against Appellants were not the result of extrajudicial bias or prejudice, but rather a response to baseless positions Appellants continue to take in the Bankruptcy Case, causing the Debtor to incur millions of dollars in unnecessary expenses.

CONCLUSION

For the foregoing reasons, the Debtor does not oppose the Motion.

² Refers to the docket number maintained in the Appeal.

Dated: June 22, 2021

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Email: jpomerantz@pszjlaw.com

ikharasch@pszjlaw.com

jmorris@pszjlaw.com

gdemo@pszjlaw.com

hwinograd@pszjlaw.com

-and-

HAYWARD PLLC

/s/ Zachery Z. Annable

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