

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**THE DUGABOY INVESTMENT TRUST,**

*Plaintiff,*

v.

**HIGHLAND SELECT EQUITY MASTER  
FUND, L.P. AND HIGHLAND SELECT  
EQUITY FUND GP, L.P.,**

*Defendants.*

**CASE NO. 1:23-cv-01636**

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Rule 1.3 of the United States Court for the Southern District of New York, Hudson M. Jobe hereby moves this Court for an Order for admission to practice Pro Hac Vice. The undersigned is bankruptcy counsel to Defendants, Highland Select Equity Master Fund, L.P. and Highland Select Equity Fund GP, L.P., in connection with recently bankruptcy filings in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division. The purpose of this request for admission is limited to filing the Suggestion of Bankruptcy attached as Exhibit “A” hereto, and not for purposes of appearing as counsel for Defendants in this proceeding.

I am in good standing of the bar of the state of Texas, and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3 as Exhibit “B” hereto.



DATED: June 1, 2023.

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,  
WINSLETT & MOSER, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
(214) 871-2100 (Telephone)  
(214) 871-2111 (Facsimile)  
[hjobe@qslwm.com](mailto:hjobe@qslwm.com) (Email)

By: /s/ Hudson M. Jobe  
Hudson M. Jobe  
State Bar No. 24041189

ATTORNEYS FOR DEFENDANTS



WHEREFORE, PREMISES CONSIDERED, the undersigned requests that the Court take notice of the bankruptcy filing by the Defendants.

Respectfully submitted,

QUILLING, SELANDER, LOWNDS,  
WINSLETT & MOSER, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
(214) 871-2100 (Telephone)  
(214) 871-2111 (Facsimile)  
[Hjobe@qslwm.com](mailto:Hjobe@qslwm.com)

By: /s/ Hudson M. Jobe  
Hudson M. Jobe  
Texas Bar No. 24041189

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served concurrently with filing on the following through the Court's electronic noticing system:

Mazin A. Sbaiti  
SBAITI & COMPANY PLLC  
2200 Ross Avenue, Suite 4900W  
Dallas, TX 75201

/s/ Hudson Jobe  
Hudson Jobe

<b>Information to identify the case:</b>	
Debtor	<b>Highland Select Equity Master Fund, L.P.</b> EIN: 98-0520466
Name	
United States Bankruptcy Court Northern District of Texas	Date case filed for chapter: 7 5/25/23
Case number:	<b>23-31037-swe7</b>

**Official Form 309C (For Corporations or Partnerships)**

**Notice of Chapter 7 Bankruptcy Case -- No Proof of Claim Deadline**

10/20

For the debtor listed above, a case has been filed under chapter 7 of the Bankruptcy Code. An order for relief has been entered.

This notice has important information about the case for creditors, debtors, and trustees, including information about the meeting of creditors and deadlines. Read all pages carefully.

The filing of the case imposed an automatic stay against most collection activities. This means that creditors generally may not take action to collect debts from the debtor or the debtor's property. For example, while the stay is in effect, creditors cannot sue, assert a deficiency, repossess property, or otherwise try to collect from the debtor. Creditors cannot demand repayment from debtors by mail, phone, or otherwise. Creditors who violate the stay can be required to pay actual and punitive damages and attorney's fees.

To protect your rights, consult an attorney. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below or through PACER (Public Access to Court Electronic Records at <https://pacer.uscourts.gov>).

**The staff of the bankruptcy clerk's office cannot give legal advice.**

**Do not file this notice with any proof of claim or other filing in the case.**

<b>1. Debtor's full name</b>	Highland Select Equity Master Fund, L.P.	
<b>2. All other names used in the last 8 years</b>		
<b>3. Address</b>	100 Crescent Court, Suite 1850 Dallas, TX 75201	
<b>4. Debtor's attorney</b>	Hudson M. Jobe Quilling, Selander, Lownds, et al 2001 Bryan Street, Suite 1800 Dallas, TX 75201	Contact Phone: (214) 871-2100 Email: hjobe@qslwm.com
<b>5. Bankruptcy trustee</b>	Scott M. Seidel Seidel Law Firm 6505 W. Park Blvd., Suite 306 Plano, TX 75093	Contact Phone: (214) 234-2500 Email: scott@scottseidel.com
<b>6. Bankruptcy clerk's office</b>	1100 Commerce Street Room 1254 Dallas, TX 75242	Hours open: Mon.-Fri 8:30-4:30 Contact Phone: 214-753-2000 Date: 5/25/23
<b>7. Meeting of creditors</b>	<b>June 20, 2023 at 12:20 PM</b>  <b>BY TELEPHONE</b>  The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.	Trustee: <b>Scott M. Seidel</b> Toll free number: <b>877-558-6034</b> Alternate number: <b>517-233-6351</b> Participant Code: <b>4157023</b>
<b>8. Proof of claim</b>	No property appears to be available to pay creditors. Therefore, please do not file a proof of claim now.  Please do not file a proof of claim unless you receive a notice to do so. If it later appears that assets are available to pay creditors, the clerk will send you another notice telling you that you may file a proof of claim and stating the deadline.	
<b>9. Creditors with a foreign address</b>	If you are a creditor receiving a notice mailed to a foreign address, you may file a motion asking the court to extend the deadlines in this notice. Consult an attorney familiar with United States bankruptcy law if you have any questions about your rights in this case.	

**INFORMATION FOR THE TELEPHONIC § 341 MEETING OF CREDITORS**

Because of developing issues with the COVID-19 virus and the national declaration of emergency by the President of the United States, § 341 Meetings of Creditors (?Meetings?) will be conducted telephonically. The telephone call in numbers and participant code are found on the enclosed Notice.

**Additional Dial-In Information:**

- (1) You must use a touch-tone phone to participate.
- (2) Landline preferred. If you have a choice, use a landline phone, instead of a cell phone. Do not use a speaker phone.
- (3) Dial the call-in number and then enter the participant code, which consists of 7 numbers and is followed by a # sign. Immediately place your phone on mute.
- (4) Make the call from a quiet area where there is as little background noise as possible.
- (5) As more than one Meeting will be held during this period, listen for your case to be called. When your case is called, unmute your phone and identify yourself.
- (6) When speaking during your case, identify yourself.
- (7) Do not put the phone on hold at any time after the call is connected.
- (8) If any party is attending the Meeting from the same location as another party, use separate touch-tone phones to participate.
- (9) Once the case Meeting is finished, hang up.
- (10) If you become disconnected before your Meeting is finished, call back.

**Bankruptcy Documents:**

Debtors should have their bankruptcy documents available in the event there are questions about the information in the documents.

**Recording:** The Meetings will be recorded by the trustee or United States Trustee.

<b>Information to identify the case:</b>	
Debtor Name	<u>Highland Select Equity Fund GP, L.P.</u> EIN: 20-3899917
United States Bankruptcy Court Northern District of Texas	Date case filed for chapter: 7 5/25/23
Case number:	23-31039-mvl7

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<b>7. Meeting of creditors</b> The debtor's representative must attend the meeting to be questioned under oath. Creditors may attend, but are not required to do so.	<b>June 20, 2023 at 12:20 PM</b>  <b>BY TELEPHONE</b>  The meeting may be continued or adjourned to a later date. If so, the date will be on the court docket.	Trustee: <b>Scott M. Seidel</b> Toll free number: <b>877-558-6034</b> Alternate number: <b>517-233-6351</b> Participant Code: <b>4157023</b>
<b>8. Proof of claim</b> Please do not file a proof of claim unless you receive a notice to do so.	No property appears to be available to pay creditors. Therefore, please do not file a proof of claim now.  If it later appears that assets are available to pay creditors, the clerk will send you another notice telling you that you may file a proof of claim and stating the deadline.	
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FUND, L.P. AND HIGHLAND SELECT  
EQUITY FUND GP, L.P.,

*Defendants.*

CASE NO. 1:23-cv-01636

**AFFIDAVIT OF HUDSON M. JOBE**

BEFORE ME, the undersigned authority on this date personally appeared Hudson M. Jobe, who after being duly sworn, upon oath did state as follows:

1. My name is Hudson M. Jobe. I am more than 21 years of age, of sound mind, and capable of making this affidavit. I have personal knowledge of all the statements made in this affidavit and they are true and correct.
2. I am an attorney licensed by the state of Texas. My bar number is 24041189.
3. I have never been convicted of a felony.
4. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
5. There are no disciplinary proceedings presently against me.
6. I declare under penalty of perjury that the foregoing is based on personal knowledge of the facts stated above and that they are just, true, and correct.

SIGNED this 1<sup>st</sup> day of June 2023.

  
HUDSON M. JOBE



THE STATE OF TEXAS    §  
                                  §  
COUNTY OF DALLAS    §

SWORN to and SUBSCRIBED before me, the undersigned authority, on the 1<sup>st</sup> day of June 2023, by Hudson M. Jobe.



Nita Chancellor  
Notary Public, State of Texas

My Commission Expires: 1-9-2027

# The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

**Hudson Mack Jobe**

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 6th day of November, 2003.

I further certify that the records of this office show that, as of this date

**Hudson Mack Jobe**

is presently enrolled with the State Bar of Texas as an active member in good standing.

**IN TESTIMONY WHEREOF** witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 1st day of June, 2023.

BLAKE HAWTHORNE, Clerk

Blake A. Hawthorne  
Clerk, Supreme Court of Texas

No. 9467C.1

**IN THE UNITED STATES DISTRICT COURT  
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FUND, L.P. AND HIGHLAND SELECT  
EQUITY FUND GP, L.P.,**

*Defendants.*

**CASE NO. 1:23-cv-01636**

**ORDER FOR ADMISSION PRO HAC VICE**

The motion of Hudson M. Jobe for admission to practice Pro Hac Vice in the above-captioned action is granted.

Applicant has declared that he is a member in good standing of the bar of the state of Texas; and that his contact information is as follows:

Applicant's Name:	Hudson M. Jobe
Firm Name:	Quilling, Selander, Lownds, Winslett & Moser, P.C.
Address:	2001 Bryan Street, Suite 1800
City/State/Zip:	Dallas, Texas 75201
Telephone/Fax:	T – (214) 871-2100; F – (214) 871-2111
Email:	hjobe@qslwm.com

Applicant having requested admission Pro Hac Vice for the limited purpose of filing a Suggestion of Bankruptcy and not for purposes of appearing as counsel for Defendants in this proceeding;

**IT IS HEREBY ORDERED** that Applicant is admitted to practice Pro Hac Vice in the above-captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before the Court as subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge