

This stipulation (the “Stipulation”) is made by and between Highland Capital Management, L.P., the reorganized debtor (“Highland”) in the above-captioned chapter 11 case (“Bankruptcy Case”) and the plaintiff in the above-captioned adversary proceeding (the “Adversary Proceeding”), and Patrick Hagaman Daugherty (“Mr. Daugherty”, and together with Highland, the “Parties”) by and through their respective undersigned counsel.

RECITALS

WHEREAS, on May 2, 2025, Highland filed its *Complaint for (1) Disallowance of Claim No. 205 in Its Entirety, (2) Estimation of Claim No. 205 for Allowance Purposes, or (3) Subordination of Any Allowed Portion of Claim No. 205 of Patrick Hagaman Daugherty* [Docket No. 1] (the “Complaint”);

WHEREAS, on May 5, 2025, the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “Court”), issued the *Summons in an Adversary Proceeding* [Docket No. 4] (the “Summons”) related to the Complaint;

WHEREAS, on May 5, 2025, the Court entered its *Order Regarding Adversary Proceedings Trial Setting and Alternative Scheduling Order* [Docket No. 3] (the “Scheduling Order”);

WHEREAS, on May 6, 2025, Highland filed its proof of service of the Complaint and the Summons on Mr. Daugherty [Docket No. 4];

WHEREAS, on June 4, 2025, Mr. Daugherty filed his *Motion to Dismiss* [Docket No. 5] (the “Motion”); and

WHEREAS, subject to the Court’s approval, the Parties have conferred in good faith to establish a schedule for the adjudication of the Motion.

NOW, WHEREFORE, IT IS HEREBY JOINTLY STIPULATED AND AGREED as follows:

1. The Parties agree that, subject to the Court's approval, the schedule set forth herein satisfies Parts II(2) & (3) of the Scheduling Order.
2. Highland shall file its opposition to the Motion on or before July 18, 2025.
3. Mr. Daugherty shall file his reply on or before August 8, 2025.
4. In the event the Motion is denied by the Court, the Parties agree that, within ten (10) days of the entry of the Court's order denying the Motion (the "Scheduling Order Deadline"), they will submit for the Court's consideration an agreed scheduling order governing the Adversary Proceeding (the "AP Scheduling Order"). If the Parties are unable to agree on a form of AP Scheduling Order by the Scheduling Order Deadline, either Party may promptly request a status conference with the Court to discuss scheduling of trial and pre-trial matters in the Adversary Proceeding.
5. This Stipulation shall not be amended or modified except by written agreement between the Parties or upon entry of an order by the Court entered after reasonable notice and a showing of good cause.

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Dated: June 16, 2025

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