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*Counsel for the Highland Claimant Trust*

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

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Reorganized Debtor.

Chapter 11

Case No. 19-34054-sgj11

**STIPULATION REGARDING THE HIGHLAND CLAIMANT TRUST'S DEADLINE  
TO FILE REPLY IN SUPPORT OF ITS MOTION FOR ORDER FIXING  
ALLOWED AMOUNT OF CLASS 11 INTERESTS**

This stipulation (the "Stipulation") is made and entered into in the above-captioned bankruptcy case by and between the Highland Claimant Trust (the "Claimant Trust"), on the one hand, and The Dugaboy Investment Trust ("Dugaboy," and together with the Claimant Trust, the "Parties"), on the other hand, by and through their respective undersigned counsel. Through this Stipulation, the Parties respectfully state and stipulate as follows:



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## **RECITALS**

**WHEREAS**, on August 8, 2025, the Claimant Trust filed its *Motion for Order Fixing Allowed Amount of Class 11 Interests* [Docket No. 4362] (the “Motion”)<sup>1</sup> seeking an order of the Court fixing the allowed amount of the unvested Class 11 Contingent Claimant Trust Interests of certain Class 11 Holders, including Dugaboy;

**WHEREAS**, on August 15, 2025, the Claimant Trust filed the *Notice of Hearing on Motion for Order Fixing Allowed Amount of Class 11 Interests* [Docket No. 4371] (the “Notice of Hearing”) noticing the Motion for hearing on September 18, 2025. The Notice of Hearing also set forth (i) September 5, 2025, as the deadline for parties to respond to the relief requested in the Motion, and (ii) September 12, 2025, as the deadline for the Claimant Trust to reply to any response to the Motion;

**WHEREAS**, on September 5, 2025, via email correspondence, counsel for the Claimant Trust and counsel for Dugaboy agreed to extend (i) Dugaboy’s deadline to file its response to the Motion to September 8, 2025, and (ii) the Claimant Trust’s deadline to file its reply to Dugaboy’s response to September 15, 2025;

**WHEREAS**, on September 5, 2025, Dugaboy filed its *Unopposed Motion to Extend Time to Respond to the Highland Claimant Trust’s Motion for Order Fixing the Allowed Amount of Class Interests* [Docket No. 4383] (the “Extension Motion”) seeking an order of the Court extending the deadlines for (i) Dugaboy to file its response to the Motion to September 8, 2025, and (ii) the Claimant Trust to file its reply to September 15, 2025;

**WHEREAS**, on September 8, 2025, Dugaboy filed its *Response Opposing Highland Claimant Trust’s Motion for Order Fixing Allowed Amount of Class 11 Interests* [Docket No.

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<sup>1</sup> Capitalized terms not otherwise defined in this Stipulation shall have the meanings ascribed to them in the Motion.

4384] (the “Dugaboy Response”), and the Dugaboy Response is the only document that has been filed in response to the Motion; and

**WHEREAS**, the Parties are executing this Stipulation to clarify that the Claimant Trust’s deadline to reply to the Dugaboy Response shall be extended to September 15, 2025.

**NOW, THEREFORE, IT IS HEREBY JOINTLY STIPULATED AND AGREED AS FOLLOWS:**

1. The Claimant Trust’s deadline to file its reply to the Dugaboy Response shall be extended to September 15, 2025.

2. This Stipulation may be executed in counterparts. A facsimile, electronic, or photocopy of this Stipulation and the signatures hereto shall have the same effect and may be accepted with the same authority as if it were an original.

3. The Parties agree that the Court shall retain jurisdiction with respect to all matters arising from or relating to the implementation, interpretation, and enforcement of this Stipulation and any order related thereto.

*[Remainder of Page Intentionally Blank]*

**SO STIPULATED AND AGREED:**

Dated: September 11, 2025

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