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Counsel for Highland Capital Management, L.P.

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

| | | |
|---|---|-----------------------------|
| In re: | § | |
| | § | Chapter 11 |
| HIGHLAND CAPITAL MANAGEMENT, L.P., ¹ | § | |
| Reorganized Debtor. | § | Case No. 19-34054-sgj11 |
| HIGHLAND CAPITAL MANAGEMENT, L.P., | § | |
| Plaintiff, | § | Adv. Proc. No. 25-03055-sgj |
| v. | § | |
| PATRICK HAGAMAN DAUGHERTY, | § | |
| Defendant. | § | |

¹ Highland’s last four digits of its taxpayer identification number are (8357). The headquarters and service address for Highland is 100 Crescent Court, Suite 1850, Dallas, TX 75201.



**STIPULATION REGARDING HIGHLAND CAPITAL MANAGEMENT, L.P.’S
DEADLINE TO FILE RESPONSE TO PATRICK DAUGHERTY’S
MOTION FOR STAY PENDING APPEAL**

This stipulation (the “Stipulation”) is made and entered into by and between plaintiff Highland Capital Management L.P. (“Highland”) and defendant Patrick Daugherty (“Daugherty,” and together with Highland, the “Parties”), by and through their respective undersigned counsel. Through this Stipulation, the Parties respectfully state and stipulate as follows:

RECITALS

WHEREAS, on May 2, 2025, Highland commenced the above-captioned adversary proceeding (the “Adversary Proceeding”) by filing 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* [Adv. Pro. Docket No. 1] (the “Complaint”).

WHEREAS, on June 4, 2025, Daugherty moved to dismiss the Complaint [Adv. Pro. Docket No. 5] (the “Motion to Dismiss”) on the ground that it was to be stayed pursuant to the terms of that certain *Settlement Agreement* by and between Highland and Daugherty (the “Settlement Agreement”) approved by the Bankruptcy Court in its *Order Approving Settlement Agreement with Patrick Hagaman Daugherty (Claim No. 205) and Authorizing Actions Consistent Therewith* [Bankr. Docket No. 3298] (the “Settlement Order”).

WHEREAS, on July 18, 2025, Highland filed its opposition to the Motion to Dismiss and cross-moved for relief from the Settlement Order [Adv. Pro. Docket Nos. 9 and 10] (the “Cross Motion”) seeking to strike the stay provision from paragraph 9 of the Settlement Agreement.

WHEREAS, on August 8, 2025, Daugherty filed his opposition to the Cross Motion [Adv. Pro. Docket No. 15].

WHEREAS, on September 5, 2025, the Bankruptcy Court entered its *Order (A) Denying Patrick Daugherty's Motion to Dismiss and (B) Granting Highland Capital Management, L.P.'s Cross Motion for Relief from a Final Order Pursuant to Bankruptcy Rule 9024* [Adv. Pro. Docket No. 23] (the "9024 Order") granting the Cross Motion and denying the Motion to Dismiss.

WHEREAS, on September 19, 2025, Daugherty commenced his appeal of the 9024 Order (the "Appeal") by filing his *Notice of Appeal* [Adv. Pro. Docket No. 25].

WHEREAS, the Appeal has been docketed as civil action no. 3:25-cv-02584-E in the United States District Court for the Northern District of Texas, Dallas Division.

WHEREAS, on September 26, 2025, Daugherty filed with the Bankruptcy Court his *Motion for Stay Pending Appeal* [Adv. Pro. Docket No. 33] (the "Stay Motion") seeking, among other things, stays of (i) the Adversary Proceeding and (ii) enforcement of the 9024 Order.

WHEREAS, pursuant to Federal Rule of Bankruptcy Procedure 8013(a)(3)(A), Highland's deadline to respond to the Stay Motion is October 3, 2025.

WHEREAS, the Parties have conferred and are executing this Stipulation to clarify that Highland's deadline to respond to the Stay Motion shall be extended to Monday, October 6, 2025.

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

1. Highland's deadline to respond to Daugherty's Stay Motion is extended to **Monday, October 6, 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]

Dated: October 1, 2025.

GRAY REED

/s/ Drake M. Rayshell

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Counsel for Highland Capital Management, L.P.

CERTIFICATE OF SERVICE

I hereby certify that, on October 1, 2025, a true and correct copy of the foregoing Stipulation was served electronically via the Court's CM/ECF system upon all parties receiving electronic notice in this Adversary Proceeding.

/s/ Zachery Z. Annable

Zachery Z. Annable