




CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

ENTERED

THE DATE OF ENTRY IS ON
THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

Signed October 1, 2025



United States Bankruptcy Judge

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

<p>In re:</p> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.,¹</p> <p style="text-align: center;">Reorganized Debtor.</p> <hr/> <p>HIGHLAND CAPITAL MANAGEMENT, L.P.,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>PATRICK HAGAMAN DAUGHERTY,</p> <hr/> <p style="text-align: center;">Defendant.</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Chapter 11</p> <p>Case No. 19-34054-sgj11</p> <p>Adversary Proceeding No. 25-03055-sgj</p>
--	--	---

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

Upon consideration of the *Stipulation Regarding Highland Capital Management, L.P.'s*

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.



Deadline to File Response to Patrick Daugherty's Motion for Stay Pending Appeal [Adv. Proc. Docket No. 36] (the "Stipulation")² by and between Highland Capital Management, L.P. ("Highland"), plaintiff in the above-captioned adversary proceeding (the "Adversary Proceeding"), and Patrick Haganan Daugherty ("Daugherty," and together with Highland, the "Parties"), it is **HEREBY ORDERED THAT:**

1. The Stipulation, a copy of which is attached hereto as **Exhibit A**, is **APPROVED**.
2. Highland's deadline to respond to the *Motion for Stay Pending Appeal* [Adv. Proc. Docket No. 33] (the "Stay Motion") is extended to **Monday, October 6, 2025**.
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 the Stipulation and this Order.

###END OF ORDER###

² Capitalized terms not otherwise defined in this Order shall have the meanings set forth in the Stipulation.

APPROVED AS TO FORM AND
SUBSTANCE:

PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (CA Bar No. 143717)
John A. Morris (NY Bar No. 2405397)
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
Email: jpomerantz@pszjlaw.com
jmorris@pszjlaw.com
gdemo@pszjlaw.com
hwinograd@pszjlaw.com

-and-

HAYWARD PLLC

/s/ Zachery Z. Annable

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.

GRAY REED

By: /s/ Drake M. Rayshell

Jason S. Brookner (Texas Bar No. 24033684)

Andrew K. York (Texas Bar No. 24051554)

Joshua D. Smeltzer (Texas Bar No. 24113859)

Drake M. Rayshell (Texas Bar No. 24118507)

1601 Elm Street, Suite 4600

Dallas, Texas 75201

Telephone: (469) 320-6050

Facsimile: (469) 320-6886

Email: jbrookner@grayreed.com

dyork@grayreed.com

jsmeltzer@grayreed.com

drayshell@grayreed.com

Counsel for Patrick Daugherty

EXHIBIT A

PACHULSKI STANG ZIEHL & JONES LLP
Jeffrey N. Pomerantz (CA Bar No.143717) (*admitted pro hac vice*)
John A. Morris (NY Bar No. 2405397) (*admitted pro hac vice*)
Gregory V. Demo (NY Bar No. 5371992) (*admitted pro hac vice*)
Hayley R. Winograd (NY Bar No. 5612569) (*admitted pro hac vice*)
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
M Hayward@HaywardFirm.com
Zachery Z. Annable
Texas Bar No. 24053075
Z Annable@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 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 Hagan 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 Hagan 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

Jason S. Brookner (Texas Bar No. 24033684)
Andrew K. York (Texas Bar No. 24051554)
Joshua D Smeltzer (Texas Bar No. 24113859)
Drake M. Rayshell (Texas Bar No. 24118507)
1601 Elm Street, Suite 4600
Dallas, Texas 75201
Telephone: (214) 954-4135
Facsimile: (214) 953-1332

Counsel for Patrick Daugherty

- and -

PACHULSKI STANG ZIEHL & JONES LLP

Jeffrey N. Pomerantz (CA Bar No. 143717)
John A. Morris (NY Bar No. 2405397)
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
E-mail: jpomerantz@pszjlaw.com
jmorris@pszjlaw.com
gdemo@pszjlaw.com
hwinograd@pszjlaw.com

- and -

HAYWARD PLLC

/s/ Zachery Z. Annable

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

Telephone: (972) 755-7100

Facsimile: (972) 755-7110

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