

ENTERED

Harry H. C. Gammie
United States Bankruptcy Judge

19340542510060000000000004

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 Hagaman 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)
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-and-

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GRAY REED

By: /s/ Drake M. Rayshell

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Counsel for Patrick Daugherty

EXHIBIT A

PACHULSKI STANG ZIEHL & JONES LLP
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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: HIGHLAND CAPITAL MANAGEMENT, L.P., ¹ Reorganized Debtor. HIGHLAND CAPITAL MANAGEMENT, L.P., Plaintiff, v. PATRICK HAGAMAN DAUGHERTY, Defendant.	§ § § § § § § § § § § § § § § § § § § §	Chapter 11 Case No. 19-34054-sgj11 Adv. Proc. No. 25-03055-sgj
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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

Jason S. Brookner (Texas Bar No. 24033684)
Andrew K. York (Texas Bar No. 24051554)
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- and -

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- and -

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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

Highland Capital Management, L.P.,
Plaintiff
Daugherty,
Defendant

Adv. Proc. No. 25-03055-sgj

CERTIFICATE OF NOTICE

District/off: 0539-3
Date Rcvd: Oct 02, 2025

User: admin
Form ID: pdf001

Page 1 of 2
Total Noticed: 5

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Oct 04, 2025:

Recip ID	Recipient Name and Address
dft	+ Patrick Hagaman Daugherty, 3621 Cornell Avenue, Suite 830, Dallas, TX 75205-2818

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
ust	+ Email/Text: ustpreion06.da.ecf@usdoj.gov	Oct 02 2025 21:57:00	United States Trustee, 1100 Commerce Street, Room 976, Dallas, TX 75242-0996
ust	+ Email/Text: ustpreion07.au.ecf@usdoj.gov	Oct 02 2025 21:57:00	United States Trustee - AU12, United States Trustee, 903 San Jacinto Blvd, Suite 230, Austin, TX 78701-2450
ust	+ Email/Text: USTPRegion07.SN.ECF@usdoj.gov	Oct 02 2025 21:57:00	United States Trustee - SA12, US Trustee's Office, 615 E Houston, Suite 533, San Antonio, TX 78205-2055
ust	+ Email/Text: ustpreion07.au.ecf@usdoj.gov	Oct 02 2025 21:57:00	United States Trustee - WA12, United States Trustee, 903 San Jacinto Blvd, Suite 230, Austin, TX 78701-2450

TOTAL: 4

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Oct 04, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

District/off: 0539-3

User: admin

Page 2 of 2

Date Rcvd: Oct 02, 2025

Form ID: pdf001

Total Noticed: 5

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 1, 2025 at the address(es) listed below:

Name	Email Address
Andrew K. York	on behalf of Defendant Patrick Hagaman Daugherty dyork@grayreed.com slangley@grayreed.com
Melissa S. Hayward	on behalf of Plaintiff Highland Capital Management L.P. MHayward@HaywardFirm.com, mholmes@HaywardFirm.com
Zachery Z. Annable	on behalf of Plaintiff Highland Capital Management L.P. zannable@haywardfirm.com, mholmes@haywardfirm.com

TOTAL: 3