



Pursuant to Federal Rule of Bankruptcy Procedure 9006(b)(1)(A), and for good cause shown, Appellant The Dugaboy Investment Trust (“Dugaboy” or “Appellant”) respectfully files this Motion and asks the Court to extend the deadline for its Reply Brief<sup>1</sup> in the above-captioned matter as follows:

(1) Dugaboy’s Reply Brief is currently due today, **January 30, 2026**.

(2) Dugaboy seeks a short extension of four (4) business days to **Thursday, February 5, 2026**.

Appellee Highland Capital does not oppose the relief requested in this Motion. Co-Appellant Patrick Daugherty is likewise unopposed.

Because Dugaboy makes this request before the expiration of the current January 30, 2026 deadline, good cause exists under Federal Rule of Bankruptcy Procedure 9006(b)(1)(A) for the Court to grant it.

### **REASONS FOR REQUESTED EXTENSION**

Dugaboy would not seek an extension on such short notice if the need were

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<sup>1</sup> Pursuant to this Court’s order dated November 24, 2025 (Dkt. 51), Appellants’ Reply Briefs are due today, January 30, 2026 (Co-Appellant Patrick Daugherty has already filed his Reply). The Parties previously asked for a thirty-day extension of the appellate briefing deadlines, which the Court granted in its October 8, 2025 order (Dkt. 38). On November 5, 2025, Dugaboy filed an unopposed motion to stay the appellate briefing deadlines (Dkt. 44) pending the Court’s rulings on Dugaboy’s then-pending Motion to Consolidate (Dkt. 39) and/or Highland’s pending Motion to Dismiss (Dkt. 21). On November 18, 2025, the Court denied the motion to stay as moot after denying the Motion to Consolidate (Dkt. 48). On November 20, 2025, Dugaboy filed an unopposed Emergency Motion to Extend Time for Appellate Briefing Deadlines (Dkt. 49), which the Court granted in an electronic order on November 24, 2025 (Dkt. 51). That order extended the deadline for Appellants’ reply briefs to January 30, 2026.

not critical. Dugaboy's counsel have experienced a confluence of problems that has caused them to fall several days behind schedule. Dugaboy's lead counsel is in the midst of moving to a new law firm, with all the disruptions such a move typically entails. The recent severe winter weather in Dallas has also caused problems, including several days' closure of counsel's office and a corresponding absence of support staff, and one of Dugaboy's attorneys experienced a loss of power. For these reasons, good cause exists to grant a short extension of four (4) business days so that counsel can recover from these disruptions and get back on schedule.

Accordingly, Dugaboy respectfully asks the Court to extend its appellate Reply Brief deadline to February 5, 2026 as proposed above.

Dated: January 30, 2026

Respectfully submitted,

**WINSTON & STRAWN LLP**

By: /s/ Geoffrey S. Harper

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***Counsel for Appellant The Dugaboy Investment Trust***

**CERTIFICATE OF SERVICE**

I certify that on January 30, 2026, a copy of this document was served electronically via the Court's CM/ECF system to the parties registered or otherwise entitled to receive electronic notices in this case.

/s/ Geoffrey S. Harper  
Geoffrey S. Harper

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Civil Rule 7.1(b), I certify that on January 30, 2026, Dugaboy counsel Mike Gaddis communicated with Highland counsel John Morris, who advised that Highland does not oppose the relief sought in this Motion. Mr. Gaddis also communicated with counsel for Co-Appellant Daugherty, who is likewise unopposed.

/s/ Geoffrey S. Harper  
Geoffrey S. Harper

**CERTIFICATE OF COMPLIANCE**

1. This document complies with the word limit of Fed. R. Bankr. P. 8013(f)(3)(A) because, excluding the portions excluded by Fed. R. Bankr. P. 8015(g), this document contains 421 words.
2. This document complies with the typeface requirements of Fed. R. Bankr. P. 8015(a)(5) and the type-style requirements of Fed. R. Bankr. P. 8015(a)(6) because this document has been prepared in a proportionally spaced typeface using Microsoft Word, typeface Times New Roman, 14-point type (12-point type in footnotes).

/s/ Geoffrey S. Harper  
Geoffrey S. Harper



Dugaboy shall file its Reply Brief by February 5, 2026.

**IT IS SO ORDERED** this [ ] day of January, 2026.

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Ed Kinkeade  
United States District Judge