

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  
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.

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

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

<sup>1</sup> Highland’s last four digits of its taxpayer identification number are (8357). The service address for Highland is 6333 Mockingbird Ln., Ste 147 #5045, Dallas, Texas 75214.



**STIPULATION AS TO THE AUTHENTICITY OF  
DOCUMENTS PRODUCED BY HUNTON ANDREWS & KURTH LLP**

---

This stipulation (the “Stipulation”) is made and entered into by and between plaintiff Highland Capital Management L.P. (“Highland” or the “Debtor”) and defendant Patrick Hagaman Daugherty (“Daugherty” and together with Highland, the “Parties”), by and through their respective undersigned counsel, pursuant to which the Parties agree that the documents produced by Hunton Andrews & Kurth LLP (“HAK”) in response to a subpoena served by Highland in the above-referenced adversary proceeding (the “Adversary Proceeding”) are authentic for purposes of Fed. R. Evid. 901.

**RECITALS**

WHEREAS, on October 16, 2019 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware, Case No. 19-12239 (CSS) (the “Delaware Court”).

WHEREAS, on December 4, 2019, the Delaware Court entered an order transferring venue of the Debtor’s bankruptcy case to the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “Bankruptcy Court”). Bankr. Docket No. 186.

WHEREAS, on May 2, 2025, Highland commenced the Adversary Proceeding against Daugherty.

WHEREAS, on December 19, 2025, Highland served a subpoena on HAK seeking certain documents.

WHEREAS, on January 22, 2026, the Court signed that certain *Agreed Order Concerning Subpoena to Third-Party Hunton Andrews & Kurth LLP*, and it was entered on the docket the

following day at Adv. Pro. Docket No. 77 (the “Subpoena”).

WHEREAS, on January 23, 2026, in response to the Subpoena, HAK produced to counsel for Highland and Daugherty documents bates-stamped Hunton 000001-2578 (the “HAK Documents”).

WHEREAS, the Parties have conferred and desire to enter into this Stipulation agreeing to the authenticity of the HAK Documents.

NOW, THEREFORE, it is hereby stipulated and agreed, and upon approval of this Stipulation by the Bankruptcy Court, it shall be SO ORDERED:

1. The Parties agree that the HAK Documents are authentic evidence for purposes of Fed. R. Evid. 901.
2. Except for the foregoing, the Parties reserve all other rights to object to the admissibility of all or any of the HAK Documents.
3. If approved by the Court, this Stipulation shall only be modified in a writing signed by the Parties or upon the entry of an order of the Court entered upon notice to the Parties.
4. The Court shall retain jurisdiction over all disputes arising out of or otherwise concerning the interpretation and enforcement of this Stipulation.

Dated: February 9, 2026.

**GRAY REED**

/s/ Andrew K. York

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.*